



December 2024

# WILDFIRES

## Additional Actions Needed to Address FEMA Assistance Challenges

## Why GAO Did This Study

In recent decades, much of the nation has witnessed an increase in the size and severity of wildfires. At the same time, development in and around wildland areas has increased. Demand for federal resources to mitigate against, respond to, and recover from these wildfires has increased.

The FEMA Improvement, Reform, and Efficiency Act of 2022 includes a provision for GAO to examine FEMA wildfire assistance programs. This report examines (1) FEMA assistance to wildfire-affected communities from fiscal years 2019 through 2023, and (2) challenges communities face with this assistance and to what extent FEMA has taken steps to address them.

GAO analyzed data from FEMA assistance programs from fiscal years 2019 through 2023 and reviewed agency policies, guidance, and assessments of FEMA's wildfire assistance. GAO interviewed officials from FEMA and a non-generalizable sample of seven state, 11 local, and four tribal governments that obtained FEMA assistance for wildfires during this period. GAO conducted site visits to Hawaii, Washington, and the Nez Perce Tribe.

## What GAO Recommends

GAO is making six recommendations, including for FEMA to provide immediate post-wildfire mitigation assistance and to establish a process to collect, assess, and incorporate ongoing feedback from FMAG recipients. DHS concurred with five recommendations and did not concur with one recommendation. GAO continues to believe all six recommendations are warranted.

View [GAO-25-106862](#). For more information, contact Chris Currie at (404) 679-1875 or [curriec@gao.gov](mailto:curriec@gao.gov).

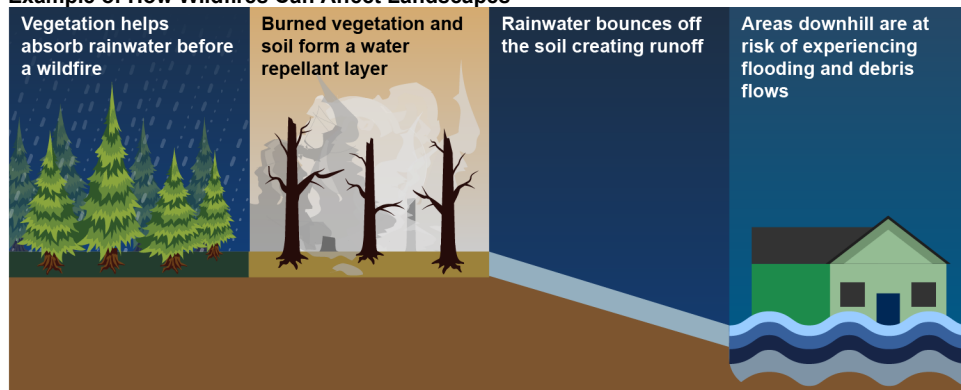
## WILDFIRES

### Additional Actions Needed to Address FEMA Assistance Challenges

## What GAO Found

The Federal Emergency Management Agency (FEMA), within the Department of Homeland Security (DHS), provided over \$3.8 billion in wildfire-related assistance from fiscal years 2019 through 2023. The agency obligated about \$3.2 billion in Public Assistance grants for emergency work (such as debris removal and emergency protective measures), and permanent recovery work (repairing or replacing roads, utilities, and buildings).

#### Example of How Wildfires Can Affect Landscapes



Source: GAO analysis of Federal Emergency Management Agency and the National Weather Service documentation. | GAO-25-106862

GAO interviewed officials from 22 state, local, and tribal governments about their experiences obtaining FEMA assistance for wildfires. Examples of challenges officials cited included:

- **Post-wildfire Mitigation.** Wildfires destroy vegetation and damage soil, creating conditions that can increase immediate risks of flooding, erosion, and debris flows—fast-moving, destructive landslides that often strike without warning. GAO found that communities continue to face challenges addressing post-wildfire risks, in part because FEMA's assistance programs are too slow to support more timely post-wildfire mitigation. Taking steps to provide immediate post-wildfire mitigation assistance could help foster more resilient communities and reduce future demand on federal resources.
- **Fire Management and Assistance Grants (FMAG) management.** State, local, and tribal officials GAO interviewed said they faced challenges associated with the FMAG program, including the quantity and complexity of required paperwork, and confusion over eligibility requirements. However, FEMA does not collect ongoing, nationwide feedback from state, local, and tribal FMAG recipients, as it does for other grant programs. Collecting, assessing, and incorporating such feedback into program policy, as appropriate, would help FEMA address challenges.

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## Abbreviations

DHS	Department of Homeland Security
FEMA	Federal Emergency Management Agency
FMAG	Fire Management Assistance Grant
HMGP	Hazard Mitigation Grant Program
NEPA	National Environmental Policy Act

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December 18, 2024

### Congressional Committees

In August 2023, the U.S. experienced the deadliest wildfire in over a century on the island of Maui in Hawaii. Multiple fast-moving fires spread across Maui, devastating the town of Lahaina, claiming over 100 lives, displacing nearly 10,000 survivors, and damaging or destroying more than 2,000 structures. In recent decades, much of the nation has witnessed an increase in the size and severity of wildfires, as well as longer wildfire seasons. At the same time, development occurring in and around wildland areas has increased, placing more people, businesses, and infrastructure at risk. Further, in some states, insurers have increased premiums or stopped issuing new policies altogether, due in part to increasing wildfire risk and associated costs. Because of these trends, demand for federal resources to mitigate against, respond to, and recover from these wildfires has increased.

Numerous federal departments and agencies have roles in wildfire mitigation, response, and recovery. Among them, within the Department of Homeland Security (DHS), the Federal Emergency Management Agency (FEMA) leads the nation's efforts to mitigate against, respond to, and recover from natural disasters, including wildfires. FEMA provides direct assistance and administers grant programs to state, local, territorial, and tribal governments, as well as aid to individual survivors. FEMA also coordinates across federal agencies to help state, local, territorial, and tribal governments following wildfire disasters.

In response to the challenges that wildfires pose for the nation, the Infrastructure Investment and Jobs Act required the establishment of the Wildland Fire Mitigation and Management Commission in 2021.<sup>1</sup> This Commission—comprised of 56 members, including five FEMA representatives—was tasked with creating policy recommendations to address wildfire mitigation and management, and post-fire rehabilitation and recovery. In its September 2023 report (the Commission report), the Commission issued a set of policy priorities and recommendations calling

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<sup>1</sup>Pub. L. No. 117-58, §§ 70201-07, 135 Stat. 429, 1250-58 (2021).

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for greater coordination, interoperability, collaboration, and simplification within the wildfire system.<sup>2</sup>

Our prior work has identified opportunities for the federal government to improve wildfire disaster mitigation, response, and recovery efforts. For example, in 2019, we reported on challenges that communities faced that were specific to and further complicated by the nature of wildfire disasters.<sup>3</sup> Given that land use practices and climate trends would continue to increase the likelihood that severe and intense wildfires would affect people and communities, we recommended that FEMA comprehensively assess how its policies and procedures work for addressing large-scale fires. In response, FEMA conducted such an assessment in July 2021. It has also taken some actions to better align its operations to address wildfires.

The FEMA Improvement, Reform, and Efficiency Act of 2022 includes a provision that we examine FEMA's policies and procedures and identify ways to improve its ability to assist state, local, and tribal governments in recovering from wildfires, among other things.<sup>4</sup> This report examines:

1. the assistance FEMA provided to wildfire-affected communities from fiscal years 2019 through 2023; and
2. any challenges affected communities face with FEMA wildfire assistance and the extent to which FEMA has taken steps to address them.

Our review examined wildfire declarations approved in fiscal years 2019 through 2023 and assistance FEMA provided to wildfire-affected communities during that time.<sup>5</sup> To answer our research questions, we analyzed data from fiscal years 2019 through 2023 for five major FEMA assistance programs: (1) Public Assistance, (2) Fire Management Assistance Grant (FMAG), (3) Individual Assistance, (4) Hazard Mitigation

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<sup>2</sup>Wildland Fire Mitigation and Management Commission, *On Fire: The Report of the Wildland Fire Mitigation and Management Commission*, (Sept. 2023).

<sup>3</sup>GAO, *Wildfire Disasters: FEMA Could Take Additional Actions to Address Unique Response and Recovery Challenges*, [GAO-20-5](#) (Washington, D.C.: Oct. 9, 2019).

<sup>4</sup>Pub. L. No. 117-251, § 6, 136 Stat. 2354, 2356-57.

<sup>5</sup>We use the term "wildfire declarations" to refer to Fire Management Assistance Grant, major disaster, or emergency declarations for wildfire incidents. For the purposes of our report, affected communities include state, local, and tribal governments as well as individual survivors.

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Grant Program (HMGP) and HMGP Post-Fire, and (5) Building Resilient Infrastructure and Communities. These programs represent the bulk of FEMA's assistance for wildfires from fiscal years 2019 through 2023.<sup>6</sup> To assess the reliability of these data, we conducted electronic data testing, reviewed database documentation, and interviewed knowledgeable agency officials about the processes for collecting and maintaining these data. Based on these steps, we determined the data to be sufficiently reliable for our purposes.

We interviewed FEMA officials and officials from a non-generalizable sample of 22 state, local, and tribal governments that obtained FEMA assistance for wildfires during this period. We selected these entities to obtain a variety of perspectives based on factors such as geographic location, number and type of wildfire declarations, and—for local governments—socio-economic status. Information from the interviews is not generalizable, however.

We also conducted site visits to Hawaii, Washington, and the Nez Perce Tribe in Idaho to obtain state, local, and tribal perspectives on FEMA assistance for wildfires. In September 2023, we visited five Washington counties and the Nez Perce Tribe, all of which received one or more FMAG and/or wildfire major disaster declarations from fiscal years 2019 through 2022. We also visited Hawaii in September 2023 to observe response and initial recovery efforts after the August 2023 wildfire major disaster. We conducted these visits to obtain state, local, and tribal perspectives on obtaining FEMA assistance; however, information from the visits is not generalizable. Lastly, we reviewed agency guidance, as well as assessments of FEMA's wildfire assistance and relevant laws. See appendix I for additional details about our scope and methodology.

We conducted this performance audit from May 2023 to December 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that

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<sup>6</sup>Public Assistance obligation amounts are as of September 2023; FMAG obligations amounts are as of September 2023; Individual Assistance expenditure and obligation amounts are as of October or November 2023 depending on the program; HMGP and HMGP Post-Fire obligation amounts are as of October 2023; and Building Resilient Infrastructure and Communities obligation amounts are as of September 2023.

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## Background

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### FEMA Assistance for Wildfires

FEMA assists state, local, and tribal governments in addressing wildfire threats as the lead federal agency for disaster mitigation, response, and recovery. While state and local entities have the primary responsibility for managing wildfires on non-federal land, these entities can seek FEMA assistance if a wildfire exceeds, or threatens to exceed, their ability to effectively respond. Additionally, FEMA may provide technical assistance and training and technological support to eligible state, local, and tribal governments.

### Federal Declarations for Wildfires

As shown in figure 1, FEMA provides most assistance for wildfires through three types of declarations: 1) Fire Management Assistance Grant (FMAG) declarations, 2) major disaster declarations, and 3) emergency declarations.<sup>7</sup>

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<sup>7</sup>These three types of declarations are authorized under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act). See 42 U.S.C. §§ 5170, 5187, 5191.



**Figure 1: Characteristics of Federal Emergency Management Agency (FEMA) Wildfire Declaration Types**

	 <b>Fire Management Assistance Grant</b>	 <b>Major disaster</b>	 <b>Emergency</b>
<b>Purpose</b>	Authorize reimbursement for fire suppression and emergency protective measures for wildfires threatening to become major disasters	Authorize emergency and permanent work, direct federal assistance, assistance to individuals, and/or hazard mitigation assistance	Authorize emergency assistance to save lives and protect property, including direct federal assistance, and assistance to individuals <sup>a</sup>
<b>Who can request</b>	State and territorial governments	State, territorial, and tribal governments	State, territorial, and tribal governments
<b>Who approves request</b>	FEMA Regional Administrator	U.S. President, via FEMA	U.S. President, via FEMA
<b>FEMA assistance programs available</b>	Fire Management Assistance Grant  Hazard Mitigation Grant Program Post-Fire	Public Assistance emergency and permanent work  Individual Assistance Hazard Mitigation Grant Program	Public Assistance emergency work  Individual Assistance-Individuals and Households Program and Crisis Counseling

Source: GAO analysis of Congressional Research Service and FEMA documentation, and federal law; Unknown Artist/stock.adobe.com. | GAO-25-106862

Notes: FEMA may approve Fire Management Assistance Grant declarations for wildfire events only, whereas emergency and major disaster declarations may be approved for all eligible hazards.

<sup>a</sup>While emergency declarations can authorize some Individual Assistance programs, it is rare. FEMA's Individual Assistance program consists of multiple component programs, including the Individuals and Households Program, which provides assistance to eligible uninsured or underinsured individuals and households with necessary expenses and serious needs due to the disaster.

**FMAG declarations.** When a wildfire burns on public or private land and threatens to become a major disaster, a state may request an FMAG declaration.<sup>8</sup> While the fire is burning uncontrolled, a state can submit a verbal request for an FMAG declaration to the designated FEMA regional office, followed within 14 days by a formal written

<sup>8</sup>42 U.S.C. § 5187(a). A state's governor or governor's authorized representative submits FMAG declaration requests on behalf of the state and/or jurisdictions within the state. While no territories received FMAG declarations in our time period, territories can also request FMAG declarations from FEMA directly.

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request.<sup>9</sup> The FEMA regional administrator then either approves or denies the request based on FMAG declaration criteria and after consulting with relevant officials from the U.S. Forest Service or bureaus within the U.S. Department of the Interior about technical aspects of the fire.<sup>10</sup>

A state approved for an FMAG declaration may then apply for grant funding to reimburse eligible expenses. The state must demonstrate that the wildfire meets pre-established cost thresholds when submitting the grant application.<sup>11</sup> Eligible FMAG costs include equipment and supplies, labor costs, temporary repairs of damage caused by firefighting activities, mobilization and demobilization of resources, and limited costs of pre-positioning fire prevention or suppression resources.<sup>12</sup> Additionally, FEMA authorizes Hazard Mitigation Grant Program (HMGP) Post-Fire for affected communities, which funds post-disaster mitigation projects. HMGP and HMGP Post-Fire provide grants to rebuild while mitigating future natural disaster losses.

**Major disaster declarations.** A state or tribal government can request that the President declare a major disaster when a wildfire is of such severity and magnitude that an effective response is beyond state, local, and/or tribal capabilities and federal assistance is therefore necessary.<sup>13</sup> According to FEMA guidance, the agency will generally not recommend a major disaster declaration for a wildfire unless the fire causes significant impacts and costs that cannot be

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<sup>9</sup>Each of FEMA's 10 regions is led by a regional administrator.

<sup>10</sup>The regional administrator is to consider four criteria when evaluating a request for an FMAG declaration: (1) threat to lives and improved property, including threats to critical facilities and infrastructure and critical watershed areas; (2) availability of state and local firefighting resources; (3) high fire danger conditions, and (4) potential major economic impact. 44 C.F.R. § 204.21(b).

<sup>11</sup>To apply for grants under an approved FMAG declaration, the state must demonstrate that it has met either the individual or cumulative fire cost threshold. The individual fire cost is based on total eligible costs for the declared fire and the cumulative fire cost is based on total eligible costs incurred during the calendar year for all declared fires and total costs incurred on non-declared wildfires. 44 C.F.R. § 204.51(b). See FEMA, *Fire Management Assistance Grant Program and Policy Guide*, (Washington, D.C.: 2021) for more information.

<sup>12</sup>44 C.F.R. § 204.42.

<sup>13</sup>See 42 U.S.C. § 5170. While no territories received major disaster declarations for wildfires during our time period, territories can also request major disaster declarations.

addressed by the FMAG program.<sup>14</sup> A major disaster declaration may provide a wide range of federal support through three key grant programs—Public Assistance, Individual Assistance, and HMGP. Table 1 describes the types of assistance available under these programs.

**Table 1: Federal Emergency Management Agency (FEMA) Assistance Available under Major Disaster Declarations**

FEMA Program	Who may apply directly	Assistance provided
Public Assistance	Eligible state, local, territorial, and tribal governments, and certain nonprofit organizations	<ul style="list-style-type: none"> <li>Emergency work, such as debris removal and emergency protective measures.</li> <li>Permanent work, such as repairing or replacing roads and bridges, water control facilities, buildings and equipment, utilities, and parks or other recreational facilities.</li> </ul>
Individual Assistance	Eligible disaster survivors and households	<ul style="list-style-type: none"> <li>Housing assistance, such as rental assistance and/or home rebuilding assistance.</li> <li>Other needs assistance, such as funeral expenses or medical costs.</li> <li>Transitional sheltering assistance for temporary sheltering via hotels.</li> <li>Disaster legal services, unemployment assistance, case management, and crisis counseling services.</li> </ul>
Hazard Mitigation Grant Program	State, territorial, and tribal governments <sup>a</sup>	<ul style="list-style-type: none"> <li>Mitigation projects designed to reduce risk and the potential impacts of future disasters.</li> <li>Examples of possible project types include property acquisition, flood risk reduction, wildfire mitigation, retrofits, secondary power sources (e.g., generators), and warning systems.</li> </ul>

Source: GAO summary of FEMA documentation and federal law. | GAO-25-106862

Note: A state, territorial, or tribal government can request that the President declare a major disaster when a wildfire is of such severity and magnitude that an effective response is beyond state, local, and/or tribal capabilities and federal assistance is therefore necessary. Not all major disaster declarations authorize all three of these assistance programs.

<sup>a</sup>A governor, tribal chief executive, or equivalent, may request that Hazard Mitigation Grant Program assistance be available throughout the state, local, territorial, or tribal area or only in specific jurisdictions. Local governments can apply for Hazard Mitigation Grant Program assistance as sub-applicants. Depending on the declaration, jurisdictions not affected directly by the disaster may qualify for assistance.

FEMA can also provide direct federal assistance under major disaster and emergency declarations. For example, FEMA can mobilize mass care resources, including providing meals and water. In some cases where a declaration authorizes Individual Assistance, FEMA may provide direct temporary housing, such as manufactured housing units. FEMA can also “mission assign” tasks to other federal

<sup>14</sup>FEMA, *Wildfires and Declarations: an Overview*, (Washington, D.C.: Apr. 2024).

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agencies.<sup>15</sup> These tasks can include debris removal, hazardous waste disposal, mortuary and forensic services, search and rescue, and more.

The President declared 13 major disasters for wildfires from fiscal years 2019 through 2023. California received five such declarations, Colorado two, and Hawaii, Montana, New Mexico, Oregon, Washington, and the Confederated Tribes of the Colville Reservation one each.

**Emergency declarations.** A state or tribal government may request an emergency declaration, which is issued by the President.<sup>16</sup> According to FEMA, emergency declarations are most often declared for wildfires when multiple fires are burning in a state simultaneously and the state needs direct federal support. Such a declaration makes limited federal financial and direct assistance available, such as for emergency response work under Public Assistance.<sup>17</sup> In some cases, emergency declarations may authorize some Individual Assistance programs for survivors. The President declared three emergency declarations for wildfires during fiscal years 2019 through 2023, with California receiving two and Oregon one. Each of these incidents later received major disaster declarations.

The type of declaration and nature of the wildfire determine the categories of assistance FEMA provides. For example, a state may initially request an FMAG declaration to obtain reimbursement for fire suppression activities for a wildfire threatening significant destruction if not contained. If the wildfire cannot be contained and causes significant damage, a state may request a major disaster declaration to receive additional types of assistance. Figure 2 demonstrates key decision points in FEMA's provision of assistance for wildfires.

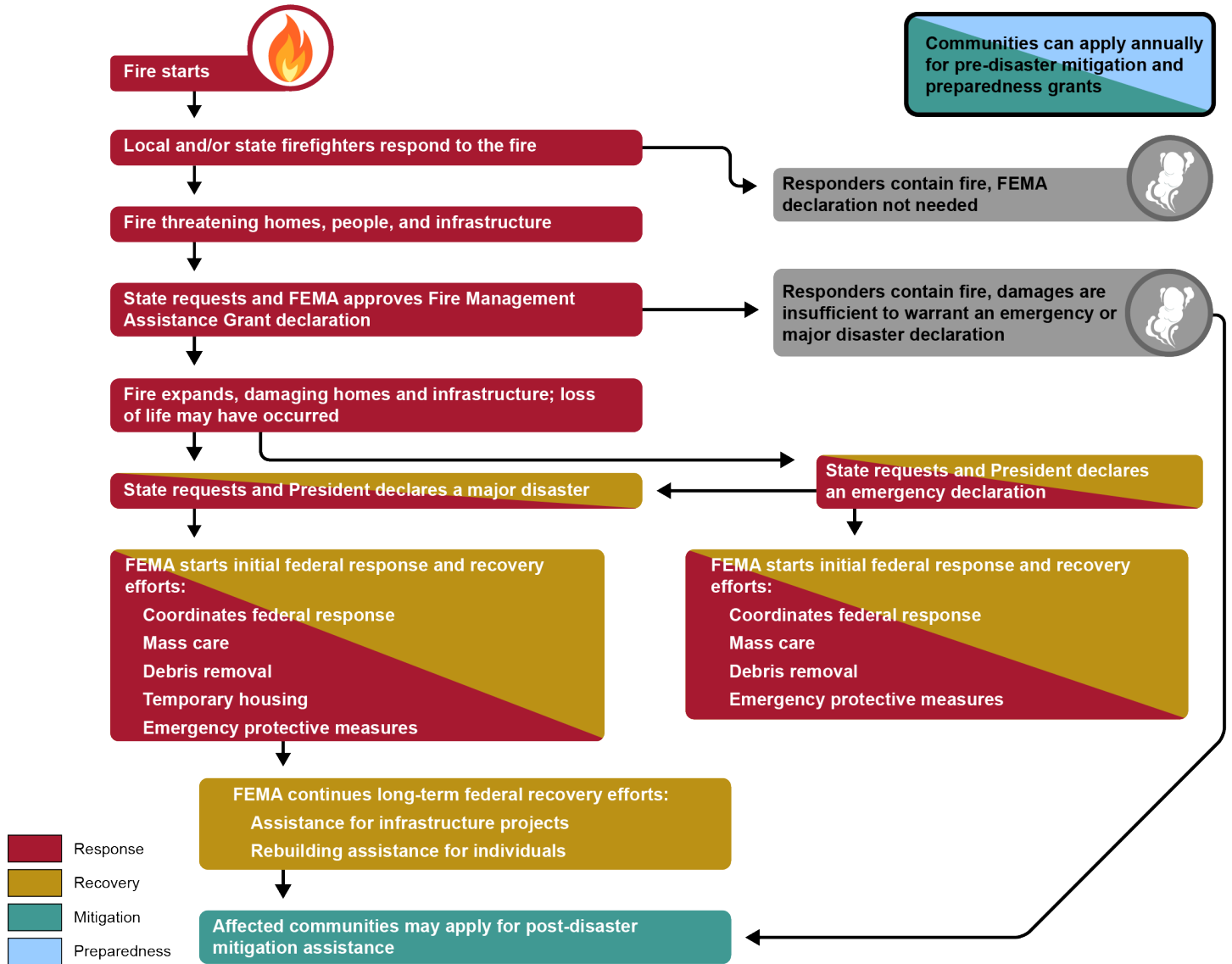
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<sup>15</sup>42 U.S.C. §§ 5170a(1), 5192(a)(1). The Stafford Act authorizes the President to direct any federal agency, with or without reimbursement, to utilize its authorities and the resources granted to it under federal law in support of state and local response efforts for emergencies. This tasking authority, delegated to the FEMA Administrator, is carried out through a mission assignment.

<sup>16</sup>42 U.S.C. § 5191. While no territories received emergency declarations for wildfire in our time period, territories can also request emergency declarations.

<sup>17</sup>Per statute, total assistance under a single emergency declaration may not exceed \$5 million unless continued emergency assistance is immediately required, there is a continued and immediate risk to lives, property, public health, or safety; and necessary assistance will not otherwise be provided on a timely basis. 42 U.S.C. § 5193.

**Figure 2: Example of Federal Emergency Management Agency (FEMA) Assistance for Wildfires Life Cycle**



Source: GAO analysis of Congressional Research Service and FEMA documentation. | GAO-25-106862

Notes: This figure represents one example of a wildfire and the different declarations and assistance paths that it could take. The timelines are not necessarily linear as several types of assistance could occur simultaneously and each wildfire has unique needs. Initial response efforts start at the local level and involve state and federal assistance when necessary. Eligibility for state, local, territorial, and tribal governments to apply directly for funding varies by program. Additionally, while assistance to individuals may be authorized under an emergency declaration, it is rare.

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## Competitive Grants and Non-financial Assistance

FEMA also provides financial assistance to wildfire-affected communities through competitive grant programs for mitigation and preparedness.<sup>18</sup> These programs are not activated in response to any type of declaration, but instead operate on an annual fiscal year funding cycle. For example, Building Resilient Infrastructure and Communities is an annual hazard mitigation grant program designed to reduce risks from disasters and natural hazards.<sup>19</sup> State, tribal, and territorial applicants can apply for grants for mitigation projects, capability and capacity building activities, and management costs.<sup>20</sup> Mitigation projects are construction projects designed to increase resilience and protect life and property from natural hazards. Capability and capacity building activities are designed to enhance knowledge and skills of the current workforce or improve the administration of mitigation assistance (e.g., establishing partnerships, project scoping, hazard mitigation planning).<sup>21</sup>

In addition to financial assistance, FEMA provides other forms of assistance to wildfire-affected communities, such as technical assistance, and training and technological support. FEMA's technical assistance includes educating potential applicants about programs they may be eligible for, assisting applicants through the application process, and creating guidance documents for applicants and recipients. Additionally, FEMA's U.S. Fire Administration provides training and technological support to help communities address structural and wildfire needs. For example, its National Fire Academy provides fire and emergency response training, and its National Fire Data and Research Center conducts research into firefighting methods and technologies.

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<sup>18</sup>FEMA administers the Emergency Management Performance Grant and Fire Grants programs (Assistance to Firefighters, Staffing for Adequate Fire and Emergency Response, and Fire Prevention and Safety). We did not include these programs in our scope because the programs are designed in a way that makes it difficult to isolate spending for wildfires, specifically. For example, Fire Grants fund emergency response capabilities for both structural fires and wildfires.

<sup>19</sup>After each major disaster is declared, FEMA may set aside 6 percent of the estimate aggregate amounts of grants to be made for the disaster for the Building Resilient Infrastructure and Communities program. See 42 U.S.C. § 5133(i). On an annual basis, FEMA assesses the amount of funding set aside for the program and determines how much will be available for the next application period.

<sup>20</sup>States and territories may submit applications on behalf of sub-applicants, which can include local governments. Tribes may submit applications directly to FEMA as an applicant or submit as a sub-applicant to a state.

<sup>21</sup>GAO initiated a review of the Building Resilient Infrastructure and Communities program in summer 2024 that will assess program processes and applicants' access to grants.

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## Other Federal Agencies' Responsibilities for Wildfires

In addition to FEMA, multiple other federal entities have responsibilities for federal wildfire mitigation, response, and recovery efforts. For example, the U.S. Forest Service within the Department of Agriculture and the Bureau of Indian Affairs, Bureau of Land Management, U.S. Fish and Wildlife Service, and National Park Service within the Department of the Interior, are responsible for managing wildfires on federal lands they oversee. The U.S. Forest Service is the lead agency for wildfire response under the National Response Framework, while the Bureau of Indian Affairs provides wildfire protection for approximately 55 million acres of lands held in trust by the U.S. for Tribes, individuals, and Alaska Natives.<sup>22</sup> This protection includes wildfire prevention, fuels management, response, and post-wildfire recovery activities.

Some of these agencies or departments administer programs that state, local, and/or tribal governments could access to address wildfire hazards.<sup>23</sup> Additionally, state, local and tribal governments can enter into mutual aid agreements with federal agencies to enable coordinated responses. Mutual aid agreements may authorize mutual aid between two or more neighboring communities, among jurisdictions within a state, between states, federal agencies, or internationally. Under these agreements, federal firefighters may respond to wildfires burning on state or private land and vice versa.

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## FEMA Provided Over \$3.8 Billion in Wildfire Assistance from Fiscal Years 2019 through 2023

FEMA provided billions of dollars in wildfire-related financial assistance through five primary assistance programs from fiscal years 2019 through 2023.<sup>24</sup> Specifically, FEMA obligated \$3.6 billion across four programs—(1) Public Assistance, (2) Fire Management Assistance Grant, (3) Hazard Mitigation Grant Program (HMGP) and HMGP Post-Fire, and (4) Building Resilient Infrastructure and Communities—and selected components of

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<sup>22</sup>FEMA, *National Response Framework, Fourth Edition*, (Washington D.C.: Oct. 2019).

<sup>23</sup>For example, in 2021, the Infrastructure Improvement and Jobs Act required the Forest Service to establish and administer the Community Wildfire Defense Grant Program. 16 U.S.C. § 6592(f). The program aims to help at-risk local communities and Tribes plan for and reduce wildfire risk.

<sup>24</sup>In addition to the assistance described in this section, the Hermit's Peak/Calf Canyon Fire Assistance Act directed FEMA to create the Hermit's Peak/Calf Canyon Claims Office to disburse compensation to claimants affected by the Hermit's Peak/Calf Canyon Fire. Pub. L. No. 117-180, 136 Stat. 2114, 2168 (2022). A total of \$3.95 billion has been appropriated to carry out the Act. Pub. L. No. 117-180, § 136, 136 Stat. 2114, 2122 (2022); Pub. L. No. 117-328, 136 Stat. 5214 (2022). This compensation is separate and different from the assistance FEMA provides in the immediate aftermath of a fire.

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its Individual Assistance program, as seen in figure 3.<sup>25</sup> Additionally, FEMA expended about \$197 million for the Individuals and Households and Transitional Sheltering Assistance programs—two of its Individual Assistance component programs for which the agency tracks expenditures rather than obligations.<sup>26</sup> Of the total amount FEMA obligated, about 89 percent, or \$3.2 billion, was for emergency and permanent recovery work through Public Assistance. For Building Resilient Infrastructure and Communities, we identified \$12 million in wildfire-related obligations during the program’s fiscal year 2020 through 2022 funding cycles. FEMA obligated an additional \$386 million in assistance under the Fire Management Assistance Grant program and HMGP and HMGP Post-Fire.

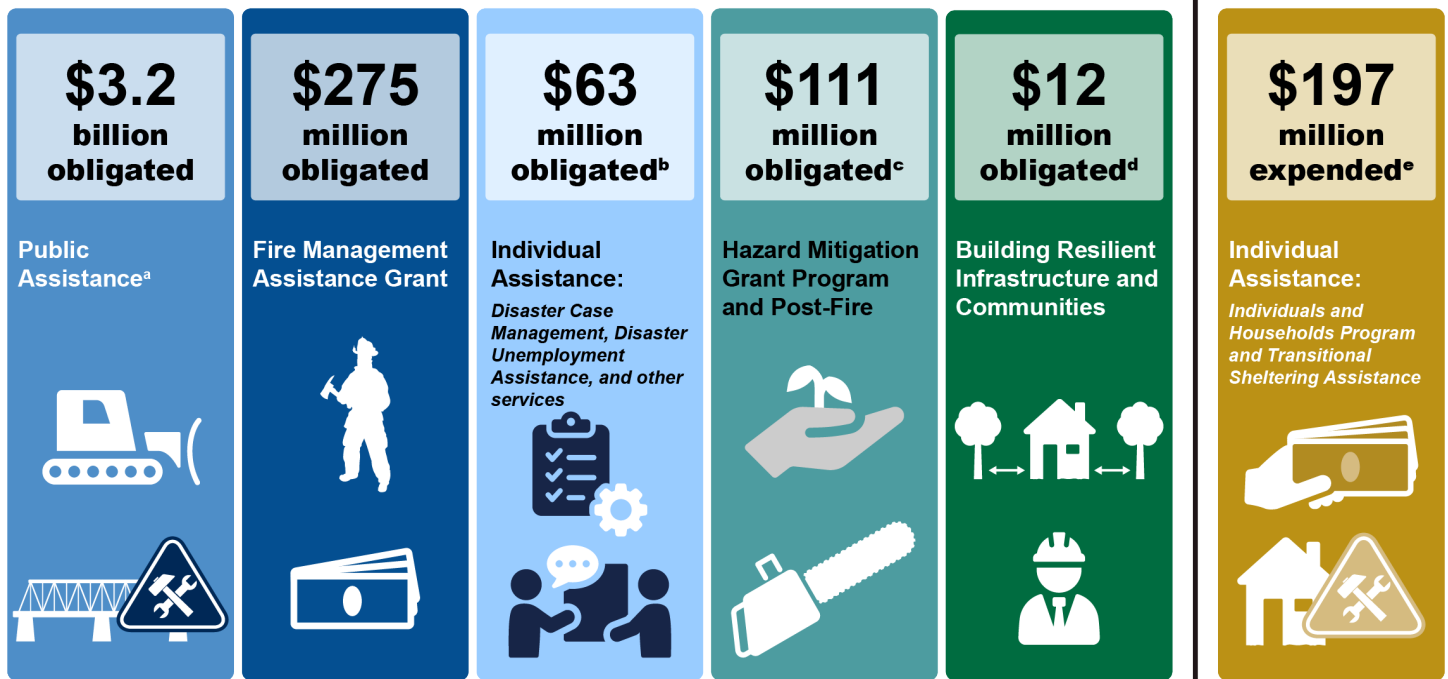
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<sup>25</sup>For Public Assistance, FMAG, and Individual Assistance we analyzed assistance provided through wildfire declarations approved in fiscal years 2019 through 2023. For HMGP and HMGP Post-Fire, we analyzed wildfire-related projects for all declarations approved from fiscal years 2019 through 2023. For Building Resilient Infrastructure and Communities, we analyzed assistance for wildfire-related projects provided through its fiscal year 2020 through 2022 funding cycles.

<sup>26</sup>According to FEMA officials, FEMA tracks expenditures rather than obligations for these programs and noted the obligations reported for these programs are estimates. When a disaster starts, FEMA obligates a pool of money that the Individuals and Household Program and Transitional Sheltering Assistance programs then draws down by making payments to individuals. FEMA reconciles the obligations and expenditures during the disaster closeout process.



**Figure 3: Federal Emergency Management Agency (FEMA) Financial Assistance for Wildfires, Fiscal Years 2019-2023**



Source: GAO analysis of FEMA data. | GAO-25-106862

Notes: Figures are rounded and include obligations or expenditures for declarations approved in fiscal years 2019-2023, except for Building Resilient Infrastructure and Communities, which is an annual grant program. The program's first funding cycle was in 2020 and as of the time of our data request in October 2023, FEMA had not yet closed the application period for the fiscal year 2023 funding cycle. During this period, FEMA was in the process of making obligations and expenditures for declarations approved in fiscal years 2019 through 2023 and FEMA may continue to obligate and expend funds in future years for those declarations. Additionally, FEMA was in the process of making obligations for Building Resilient Infrastructure and Communities projects selected in fiscal years 2020 through 2022. FEMA may also de-obligate funds, especially at the end of the process. As a result, obligated and expended amounts for these programs will change over time.

<sup>a</sup>FEMA's Public Assistance assists communities through emergency assistance to save lives and protect property and/or assistance to permanently restore community infrastructure.

<sup>b</sup>FEMA tracks obligations for the following Individual Assistance component programs: Disaster Case Management, Disaster Unemployment Assistance, Crisis Counseling Assistance and Training Program, and Disaster Legal Services.

<sup>c</sup>Applicants can use Hazard Mitigation Grant Program and Hazard Mitigation Grant Program Post-Fire to address any type of natural disaster, and many projects are multi-hazard in nature. We considered a project wildfire-related if applicants chose a project type containing the word "wildfire" and/or if they indicated the primary hazard type for the project was fire.

<sup>d</sup>In our analysis, wildfire-related projects are those for which the applicant selected "fire" as a primary, secondary, or tertiary hazard. Some of these projects are multi-hazard planning projects, including developing hazard mitigation plans.

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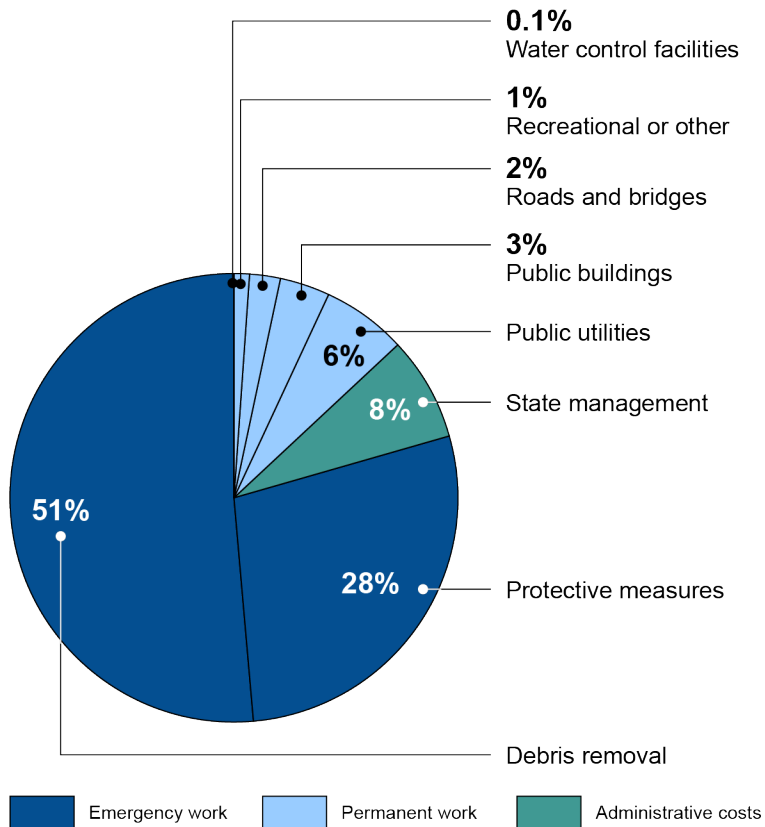
<sup>6</sup>FEMA reported obligating about \$212 million for the Individuals and Households Program and about \$69 million for Transitional Sheltering Assistance for disasters declared in fiscal years 2019 through 2023. According to FEMA officials, FEMA tracks expenditures, rather than obligations, for these programs and noted the obligations reported for these programs are estimates. When a disaster starts, FEMA obligates a pool of money that the Individuals and Household Program and Transitional Sheltering Assistance programs then draws down by making payments to individuals and to hotels, respectively. FEMA reconciles the obligations and expenditures during the disaster closeout process.

**Public Assistance.** FEMA obligated about \$3.2 billion for Public Assistance projects for 12 wildfire major disaster declarations approved from fiscal years 2019 through 2023 across six states and one Tribe, as of September 2023.<sup>27</sup> FEMA obligated over \$2.5 billion for emergency work, such as debris removal and protective measures; about \$416 million for permanent work, such as projects to rebuild or repair bridges, roads, and public utilities; and about \$237,000 for state administrative costs, as shown in figure 4.

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<sup>27</sup>Obligations data are as of September 2023. FEMA was in the process of making obligations for declarations approved in fiscal years 2019 through 2023 and may continue to make obligations in future years for those declarations. Additionally, FEMA may de-obligate funds, especially at the end of the process. As a result, obligated amounts will change over time. The six states are California, Colorado, Washington, Hawaii, New Mexico, and Oregon. Montana also received a major disaster declaration in 2021 (DR-4623) under which the President authorized Public Assistance. FEMA Public Assistance project data did not include any Public Assistance projects for that disaster. FEMA also obligated Public Assistance funds to the Confederated Tribes of the Colville Reservation under the Tribe's own major disaster declaration. Tribes may also have received Public Assistance under a state's major disaster declaration, but the data we obtained did not allow us to identify these cases. Because the wildfire incidents that received emergency declarations in our time period also later received major disaster declarations, all obligations for those wildfires are under the corresponding major disaster declarations, per FEMA officials.

**Figure 4: Public Assistance Obligations by Project Category for Wildfire Major Disasters, Fiscal Years 2019-2023**



Source: GAO analysis of Federal Emergency Management Agency data. | GAO-25-106862

Notes: The Federal Emergency Management Agency (FEMA)'s Public Assistance grant program assists communities through emergency assistance to save lives and protect property and/or assistance to permanently restore community infrastructure. FEMA obligated about \$3.2 billion through the Public Assistance program for wildfire major disaster declarations approved in fiscal years 2019 through 2023, as of September 2023. A state, territorial, or tribal government can request that the President declare a major disaster when a wildfire is of such severity and magnitude that effective response is beyond the state, local, territorial, and/or tribal capabilities and federal assistance is necessary.

Debris removal comprised a higher proportion of Public Assistance obligations for wildfire disasters (51 percent) compared to non-wildfire disasters during the same time period (24 percent). Wildfires create unique debris removal challenges because they typically leave no remaining structures. Additionally, the resulting ash contains contaminants that must be carefully removed and disposed of before survivors can return to their properties. Therefore, the wildfire debris

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removal process can be costlier and more complicated than for other types of disaster debris, as we have previously reported.<sup>28</sup>

In addition to debris removal, local and tribal officials we interviewed used Public Assistance grants for a variety of purposes, such as replacing guardrails and fencing, personnel costs, repairing electrical poles and lines, and rebuilding public facilities. For example, the town of Malden in Whitman County, Washington, received Public Assistance to rebuild public infrastructure and to provide temporary structures for key government services following a 2020 wildfire major disaster. The town used Public Assistance grants for building a temporary fire station and rebuilding a new multi-purpose town hall building, among other projects, as shown in figure 5.

**Figure 5: Town of Malden, WA used Public Assistance Grants for Town Facilities, September 2023**



**Temporary fire station**



**Construction on town hall**

Source: GAO. | GAO-25-106862

**Fire Management Assistance Grants.** As of September 30, 2023, FEMA obligated about \$275 million through 89 of the 209 FMAG declarations approved in fiscal years 2019 through 2023, as shown in

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<sup>28</sup>[GAO-20-5](#).

table 2.<sup>29</sup> For FMAG declarations with associated grants, the median amount obligated by declaration was about \$417,000. We also found about 41 percent of FMAG declarations and more than half of the fire mitigation assistance grant funding, were for wildfires approved in fiscal year 2020.

**Table 2: Number of Fire Management Assistance Grant (FMAG) Declarations and Amounts Obligated by Declaration Fiscal Year**

Declaration Fiscal Year	Number of FMAG Declarations	Number of FMAG Declarations with Obligations	Total Amount Obligated <sup>a</sup>
2019	15	11	\$32,600,000
2020	85	44	\$149,900,000
2021	40	18	\$80,800,000
2022	38	16	\$11,900,000
2023	31	0	\$0
<b>Total</b>	<b>209</b>	<b>89</b>	<b>\$275,200,000</b>

Source: GAO analysis of Federal Emergency Management Agency (FEMA) data. | GAO-25-106862

Note: A state or territory may request an FMAG declaration when a wildfire burns on public or private land and threatens to become a major disaster. The FMAG program assists in reimbursement for equipment, supplies, and personnel.

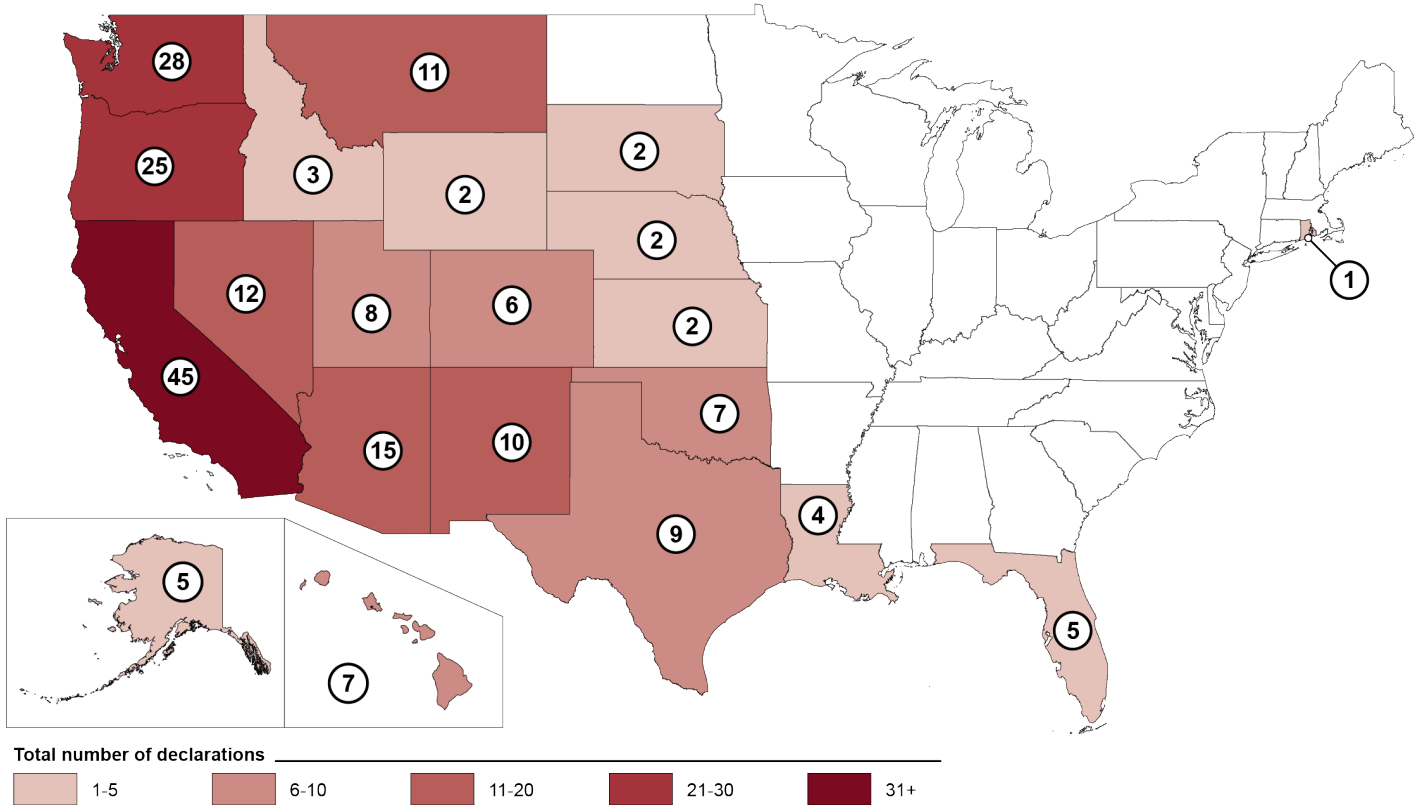
<sup>a</sup>Amounts obligated are rounded to the nearest hundred thousand, by the fiscal year the FMAG declaration was approved, and are as of the end of fiscal year 2023. FEMA was in the process of making obligations for declarations approved in fiscal years 2019 through 2023 and may continue to make obligations in future years for those declarations. Additionally, FEMA may de-obligate funds, especially at the end of the process. As a result, obligated amounts will change over time. FEMA officials provided several reasons FMAG declarations may not have obligations, such as applications being in process, declarations being rolled up into major disaster declarations, or applicants not meeting cost thresholds to receive FMAG grants under an approved declaration.

The majority of FMAG declarations were in western states, as shown in figure 6. Four states—California, Oregon, Alaska, and Arizona—represented about 43 percent of the FMAG declarations (90 of 209) and received about 94 percent of grant obligations (about \$258 million). Counties we spoke with reported using FMAG funding for purposes such

<sup>29</sup>FEMA was in the process of making obligations for FMAG declarations approved in fiscal years 2019 through 2023 and may continue to make obligations in future years for those declarations. Additionally, FEMA may de-obligate funds, especially at the end of the process. As a result, obligated amounts will change over time. FEMA officials provided several reasons FMAG declarations may not have obligations, including applications being in process or declarations later being rolled up into major disaster declarations. In such cases, FEMA typically makes any obligations under the major disaster declaration. Additionally, applicants must meet cost thresholds to receive FMAG grants under an approved declaration.

as overtime pay, roadblocks, temporary firefighter pay, or replacing or purchasing equipment such as firetrucks.

**Figure 6: Number of Fire Management Assistance Grant Declarations by State, Fiscal Years 2019-2023**



Source: GAO analysis of Federal Emergency Management Agency data. | GAO-25-106862

Note: A state or territory may request a Fire Management Assistance Grant declaration when a wildfire burns on public or private land and threatens to become a major disaster.

**Individual Assistance.** FEMA authorized Individual Assistance for eight of the 13 wildfire major disasters declared in fiscal years 2019 through 2023. FEMA tracks expenditures for two of its Individual Assistance component programs—Individuals and Households Program and Transitional Sheltering Assistance—and obligations for the other programs. As shown in table 3, the Individuals and Households Program accounted for 97 percent (\$191 million) of FEMA’s expenditures for these

two programs for wildfire disasters during this time.<sup>30</sup> FEMA’s Individuals and Households Program provides financial assistance and direct services to eligible individuals and households who have uninsured or underinsured necessary expenses and serious needs due to the disaster.

**Table 3: FEMA Individual Assistance Component Program Expenditures for Wildfire Disasters Declared Fiscal Years 2019-2023**

Individual Assistance Component Program Name	Number of disasters with expenditures	Expenditures
Individuals and Households Program- Housing Assistance	8	\$138 million
Individuals and Households Program- Other Needs Assistance	8	\$53 million
Transitional Sheltering Assistance	3	\$6 million

Source: GAO analysis of Federal Emergency Management Agency (FEMA) data. | GAO-25-106862

Notes: FEMA’s Individuals and Households Program provides financial assistance and direct services to eligible individuals and households who have uninsured or underinsured necessary expenses and serious needs due to the disaster. The Transitional Sheltering Assistance program provides temporary sheltering in hotels for survivors. Expenditure data for the Individuals and Households Program are as of October 2023. Transitional sheltering assistance expenditures are as of November 2023. FEMA was in the process of making expenditures for declarations approved in fiscal years 2019 through 2023 and may continue to make expenditures in future years for those declarations. As a result, expended amounts will change over time.

FEMA also obligated about \$63 million through its other Individual Assistance programs, which provide assistance for services such as counseling, legal advice, and case management, as shown in table 4.<sup>31</sup>

<sup>30</sup>Expenditure data for the Individuals and Households Program component of Individual Assistance are as of October 2023. Transitional sheltering assistance expenditures are as of November 2023. FEMA was in the process of making expenditures for declarations approved in fiscal years 2019 through 2023 and may continue to make expenditures in future years for those declarations. As a result, expended amounts will change over time.

<sup>31</sup>Obligations for these Individual Assistance programs are as of November 2023. FEMA was in the process of making obligations for declarations approved in fiscal years 2019 through 2023 and may continue to make obligations in future years for those declarations. Additionally, FEMA may de-obligate funds, especially at the end of the process. As a result, obligated amounts will change over time. For more information about Individual Assistance component programs, see [GAO-20-5](#), Appendix I.

**Table 4: FEMA Individual Assistance Component Program Obligations for Wildfire Disasters Declared Fiscal Years 2019-2023**

Individual Assistance Component Program Name	Number of disasters with obligations	Obligations
Disaster Case Management <i>Provides financial assistance to state, local, territorial, and tribal government agencies, or qualified private organizations to provide case management services to survivors.</i>	7	\$33 million
Crisis Counseling Assistance and Training Program <i>Provides financial assistance to eligible state, local, territorial, and tribal governments and non-governmental organizations to provide survivors with supportive crisis counseling, development of coping skills, and connections to appropriate resources, among other things.</i>	8	\$23 million
Disaster Unemployment Assistance <i>Provides unemployment benefits and re-employment assistance to survivors who are not eligible for regular state unemployment insurance.</i>	8	\$7 million
Disaster Legal Services <i>Provides legal aid to low-income survivors through an agreement with the Young Lawyers Division of the American Bar Association.</i>	8	\$0.03 million

Source: GAO analysis of Federal Emergency Management Agency (FEMA) data. | GAO-25-106862

Notes: Obligations for these Individual Assistance component programs are as of November 2023. FEMA was in the process of making obligations for declarations approved in fiscal years 2019 through 2023 and may continue to make obligations in future years for those declarations. Additionally, FEMA may de-obligate funds, especially at the end of the process. As a result, obligated amounts will change over time.

For FEMA’s largest Individual Assistance component program—the Individuals and Households Program—we previously reported that from 2010 through 2019, the median amount provided to individual survivors for all hazards was relatively small compared to the maximum allowable amount.<sup>32</sup> According to FEMA analysis of program data from 2013 through 2023, the median award was \$1,000 for non-wildfire disasters and \$3,150 for wildfire disasters, which tend to completely destroy homes. FEMA officials explained that most individuals received relatively small awards compared to the maximum amounts because most individuals have homeowner’s insurance. Until recent regulatory changes, FEMA did not award any housing assistance to individuals who received at least the maximum FEMA award for housing repairs from their

<sup>32</sup>The maximum amounts individuals may receive for housing and other needs assistance are capped by statute. 42 U.S.C. § 5174(h). FEMA adjusts the maximum amounts for housing assistance and other needs assistance for inflation annually. See 44 C.F.R. § 206.110(b). In fiscal year 2024, for example, the maximum amount was \$42,500 each for housing assistance and other needs assistance. 88 Fed. Reg. 72,520 (Oct. 20, 2023). GAO, *Disaster Assistance: Additional Actions Needed to Strengthen FEMA’s Individuals and Households Program*, [GAO-20-503](#) (Washington, D.C.: Sept. 30, 2020).



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insurance company, even if there was a gap between their insurance coverage and their losses. For disasters with Individual Assistance declared on or after March 22, 2024, FEMA will now award housing assistance to those who receive insurance payouts that exceed the FEMA maximum award for their losses, up to the statutory maximums, if they have eligible unmet needs or uncovered losses.<sup>33</sup> FEMA officials said they expect the amounts of Individual Assistance the agency awards to increase due to this change.

**HMGP and HMGP Post-Fire.** Relatively few of the HMGP and HMGP Post-Fire projects (about 6 percent, or 393 of 6,798) submitted under declarations approved in fiscal years 2019 through 2023 were wildfire-related.<sup>34</sup> For wildfire-specific declarations, this increased to 35 percent (311 of 893) of HMGP and HMGP Post-Fire projects that were wildfire-related. FEMA obligated about \$111 million for these wildfire mitigation projects as of October 2023, as shown in table 5.<sup>35</sup> Applicants may submit HMGP and HMGP Post-Fire projects relating to any type of eligible hazard, not only the type of hazard that led to the declaration. For example, if a state receives a major disaster or FMAG declaration for a wildfire, communities can apply for HMGP or HMGP Post-Fire funding to mitigate against other specific hazards, such as earthquakes, or for multi-hazard projects, such as updating hazard mitigation plans.

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<sup>33</sup>See 44 C.F.R. § 206.113(a)(5). FEMA has also made other regulatory changes to the Individual Assistance program intended to improve access to assistance for survivors. 89 Fed. Reg. 3990 (Jan 22, 2024). See also FEMA, Biden-Harris Administration Reforms Disaster Assistance Program to Help Survivors Recover Faster, (Washington, D.C.: 2024) for more information.

<sup>34</sup>We identified 393 of 6,798 total HMGP and HMGP Post-Fire projects that were related to wildfire mitigation. We considered a project wildfire-related if applicants chose a project type containing the word “wildfire” and/or if they indicated the primary hazard type for the project was fire.

<sup>35</sup>FEMA was in the process of making obligations for declarations approved in fiscal years 2019 through 2023 and may continue to make obligations in future years for those declarations. Additionally, FEMA may de-obligate funds, especially at the end of the process. As a result, obligated amounts will change over time.

**Table 5: Hazard Mitigation Grant Program (HMGP) and HMGP Post-Fire Wildfire-related Projects and Obligations, by Declaration Fiscal Year**

<b>Declaration Fiscal Year</b>	<b>Number of Wildfire-related Projects<sup>a</sup></b>	<b>Total Amount Obligated<sup>b</sup></b>
2019	88	\$41,200,000
2020	159	\$54,900,000
2021	106	\$14,200,000
2022	39	\$300,000
2023	1	\$0
<b>Total</b>	<b>393</b>	<b>\$110,600,000</b>

Source: GAO analysis of Federal Emergency Management Agency (FEMA) data. | GAO-25-106862

Note: HMGP and HMGP Post-Fire provide grants to rebuild in a way that mitigates future natural disaster losses.

<sup>a</sup>We considered a project wildfire-related if applicants chose a project type containing the word “wildfire” and/or if they indicated the primary hazard type for the project was fire.

<sup>b</sup>Amounts obligated are rounded to the nearest hundred thousandth, by the fiscal year the FMAG or major disaster declaration was approved, and as of the end of October 2023. FEMA was in the process of making obligations for declarations approved in fiscal years 2019 through 2023 and may continue to make obligations in future years for those declarations. Additionally, FEMA may de-obligate funds, especially at the end of the process. As a result, obligated amounts will change over time.

According to our data analysis and interviews with county and tribal officials, applicants used HMGP and HMGP Post-Fire for wildfire mitigation projects such as: purchasing generators, updating multi-hazard mitigation plans, conducting vegetation management, protecting public utilities, establishing warning systems, and replacing or repairing culverts and cisterns. One county we interviewed in Montana joined a multi-county effort to map coal seam fires—a growing wildfire threat—using their state’s HMGP award under the state’s COVID-19 major disaster declaration, as described in figure 7.

**Figure 7: Wildfire Mitigation in Action: Four Counties Map Coal Seam Fires in Eastern Montana**



**Coal seam fire in eastern Montana**

**What is a coal seam fire?**

Coal seam fires can occur when underground coal seams are exposed to the ground's surface. Coal is extremely flammable and coal seam fires can start from surface-level grassland fires, lightning strikes, or hot gasses venting from inside the earth. A county official said that the coal seam fires in eastern Montana have started from small coal seams exposed due to erosion of the soil above them.

**What threat do coal seam fires pose?**

Coal seam fires can ignite wildfires in the surrounding vegetation. In 2021, over 200,000 acres burned in eastern Montana from wildfires that started from coal seam fires, according to a county official.

**What are Montana counties doing about this threat?**

Custer, Rosebud, Bighorn, and Powder River counties are using aerial mapping to identify active coal seam fires in their region. Ground teams then verify the aerial map and add GPS coordinates. Since the start of the project, they have mapped over 1,000 coal seam fires in the area as of January 2024, according to a Custer County official.



**Drone footage of coal seam fire, eastern Montana**

**What federal funding are the counties using?**

The counties began the mapping effort with a grant from the U.S. Department of Agriculture and have continued with Federal Emergency Management Agency Hazard Mitigation Grant Program funding.

**What is the next step?**

Once the mapping is complete, officials said the counties will try to obtain funding for mitigation activities. Rosebud County officials told us that while it is likely not possible to fully extinguish all the burning coal seams, mitigative efforts in the areas surrounding coals seams, such as vegetation and fuels management, could help reduce wildfire risk.

Source: GAO interviews with Rosebud and Custer Counties; Photo: CM THERMAL . | GAO-25-106862

**Building Resilient Infrastructure and Communities.** FEMA obligated over \$12 million for wildfire-related projects through the Building Resilient Infrastructure and Communities program’s fiscal year 2020 through 2022 funding cycles.<sup>36</sup> FEMA obligated more than half of these funds (about \$6.4 million) for 50 wildfire-related capability and capacity building projects, such as updating hazard mitigation plans and developing building codes and standards to improve community resilience. As of the end of fiscal year 2023, FEMA had obligated about \$5.8 million for two wildfire mitigations projects selected during the fiscal year 2020 application cycle, as shown in table 6.

**Table 6: Number of Projects and Amounts Obligated to Wildfire-related Building Resilient Infrastructure and Communities Projects, by Funding Cycle Fiscal Year**

Funding cycle fiscal year	Capability and capacity building projects		Mitigation projects	
	Number of projects with obligated funds	Amount obligated	Number of projects with obligated funds	Amount obligated
2020	32	\$2,920,000	2	\$5,790,000
2021	16	\$2,800,000	0	\$0
2022	2	\$630,000	0	\$0
<b>Total</b>	<b>50</b>	<b>\$6,350,000</b>	<b>2</b>	<b>\$5,790,000</b>

Source: GAO analysis of Federal Emergency Management Agency (FEMA) data. | GAO-25-106862

Notes: Building Resilient Infrastructure and Communities is an annual hazard mitigation grant program designed to reduce risks from disasters and natural hazards. Obligations data are as of the end of fiscal year 2023 and are rounded to the nearest ten thousand. FEMA was in the process of making obligations for projects approved in the fiscal year 2020 through 2022 funding cycles and may continue to make obligations in future years for those projects. Additionally, FEMA may de-obligate funds, especially at the end of the process. As a result, obligated amounts will change over time. In our analysis, wildfire-related projects are those for which the applicant selected “fire” as a primary, secondary, or tertiary hazard type.

<sup>36</sup>FEMA reported obligating about \$307 million for all Building Resilient Infrastructure and Communities projects during these funding cycles, as of September 2023. FEMA’s first funding cycle for Building Resilient Infrastructure and Communities was for fiscal year 2020. As of the time of our data request in October 2023, FEMA had not yet closed the application period for fiscal year 2023 projects. Obligations data are as of September 30, 2023. FEMA was in the process of making obligations for projects approved in the fiscal year 2020 through 2022 funding cycles and may continue to make obligations in future years for those projects. Additionally, FEMA may de-obligate funds, especially at the end of the process. As a result, obligated amounts will change over time. Wildfire-related projects are those for which the applicant selected “fire” as a primary, secondary, or tertiary hazard type.

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### Selected Wildfire Mitigation Techniques

- *Ignition-resistant construction*: using non-combustible or ignition-resistant materials, technologies, and techniques on new and existing buildings and structures. This is also called home hardening when used for residential structures.
- *Defensible space*: creating a perimeter around a building or structure by removing or reducing the amount of flammable vegetation.
- *Fuels reduction*: removing or modifying vegetative fuels near structures, such as by thinning vegetation or replacing flammable vegetation with fire-resistant vegetation.
- *Post-wildfire flooding prevention*: measures to protect property from flooding, debris flows, and mudslides due to soil damage from wildfires. Examples include soil stabilization, reforestation, seeding, erosion control, and debris traps and drainage systems.

Source: Federal Emergency Management Agency and California Department of Forestry and Fire Prevention documentation. | GAO-25-106862

The two wildfire mitigation projects focus on altering the built environment, such as protective measures for homes and other infrastructure:

- FEMA obligated over \$5.7 million to a wildfire mitigation project in Sonoma County, California. According to the project description, the project is intended to increase community resilience to wildfires through implementing home hardening with ignition-resistant construction, defensible space, and hazardous fuels reduction techniques. See sidebar for descriptions of selected wildfire mitigation techniques.
- FEMA obligated about \$65,000 for a project that will apply fire retardant mesh to over 1,000 electric poles in Butte and South Custer counties, Idaho, to mitigate wildfire threats to the electrical distribution system.

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## FEMA Has Not Fully Addressed the Challenges Communities Face in Obtaining Wildfire Assistance

FEMA has begun some efforts to address long-standing wildfire assistance challenges, but it is too soon to assess their impact. Additionally, the agency does not have an assistance program that enables communities to conduct immediate post-wildfire mitigation and has not fully pursued opportunities to facilitate more timely environmental reviews for post-wildfire mitigation. FEMA could also do more to identify and address FMAG program-related challenges. For example, state, county, and tribal officials we interviewed described challenges associated with the FMAG program, but FEMA headquarters does not collect ongoing, nationwide feedback from all FMAG recipients.<sup>37</sup> FEMA also has not clarified FMAG guidance on (1) requesting FMAG declarations for fires burning on federal land but threatening nearby communities or (2) receiving reimbursement for costs associated with pre-positioning of in-state resources. Lastly, officials that we spoke to said

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<sup>37</sup>States and tribal governments can apply for fire management assistance grants as recipients, while local governments can apply as sub-recipients. A sub-recipient is awarded a subgrant and is accountable to the recipient for grant usage. For our purposes, the term "FMAG recipient" includes both recipients and sub-recipients.

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Tribes' access to FMAG assistance is limited because tribal governments can only request FMAG declarations through a state.

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## FEMA Has Taken Some Steps to Address Long-Standing Challenges Providing Wildfire Assistance

### Timeliness and Administrative Burdens

State, county, and tribal officials that we interviewed described challenges with timeliness—including in FEMA's application decisions and reimbursements—and administrative burdens when obtaining FEMA assistance. Officials from nine out of 11 counties, all four Tribes, and all seven states we spoke to described timeliness as a challenge in one or more of FEMA's assistance programs. These challenges related to the timeliness of FEMA application decisions and reimbursements.

**Application Decisions.** The time it takes for FEMA to review and either approve or deny projects may discourage some communities from applying for FEMA assistance. Per regulation, applicants are not allowed to begin HMGP or HMGP Post-Fire projects until FEMA approves them.<sup>38</sup> One county official said he had applied for seven HMGP Post-Fire grants since 2019 totaling about \$4.6 million. The proposed projects involved reducing hazardous fuels, thinning vegetation, and creating defensible spaces. The official said that as of January 2024, FEMA had not made a determination for any of these projects, preventing the county from starting them. The official added that the county is reluctant to apply for additional projects because it could not implement all the projects if they are approved at the same time. Officials from another county said that they were awaiting FEMA approval to replace generators under the HMGP Post-Fire program more than 3 years after a 2020 wildfire. Our data analysis found that about 44 percent (108 of 247) of wildfire-related HMGP and HMGP Post-Fire project applications from declarations approved in fiscal years 2019 or 2020 were in a pending status—meaning the projects were in various stages of review—as of October 2023.

**Reimbursements.** Officials also brought up concerns about timeliness of reimbursements with multiple FEMA assistance programs, such as Public Assistance. For example, officials in one

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<sup>38</sup>44 C.F.R. § 206.434(d)(2).

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county stated that as of September 2023, they had not received reimbursements for a project they applied for after a 2020 wildfire. Additionally, we found that FEMA had made obligations for two of the 27 wildfire mitigation projects initially selected in the fiscal year 2020 through 2022 Building Resilient Infrastructure and Communities funding cycles as of the end of fiscal year 2023.<sup>39</sup> Both projects were selected in the fiscal year 2020 funding cycle. As of the end of fiscal year 2023, FEMA had not made obligations for any mitigation projects selected in the fiscal year 2021 or 2022 funding cycles. The Wildfire Mitigation and Management Commission's 2023 report (Commission report) also noted that delays in reimbursements can deter local entities and Tribes from deploying resources to assist in response, as doing so risks straining their budgets and going into deficit for months or years until receiving reimbursement.<sup>40</sup>

Some officials noted the connection between timeliness and administrative burdens, stating that issues with FEMA's timeliness in providing assistance resulted in further administrative burdens and costs. Officials from eight out of 11 counties, three out of four Tribes, and all seven states we spoke to described one or more of the previously described FEMA assistance programs as administratively burdensome.<sup>41</sup> In particular, they noted repeated requests for information and having to redo required assessments. For example, a county official said FEMA submitted requests for information multiple times over a 2-year period for the county's HMGP Post-Fire project, creating additional and duplicative work. Officials from one FEMA region said that continuous requests for information can be challenging for applicants and that it is important to reach understanding on the project needs at the start of the process.

Additionally, officials from three counties we spoke with said the length of FEMA's review for proposed HMGP project applications required them to redo and resubmit all or parts of their application as circumstances or

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<sup>39</sup>FEMA's Building Resilience Infrastructure and Communities program data do not indicate whether a project received final approval. Headquarters program officials initially select projects and then send the application to the appropriate FEMA region for further review and processing. FEMA officials stated that the agency may not ultimately select all these projects for awards during this review stage.

<sup>40</sup>*On Fire: The Report of the Wildland Fire Mitigation and Management Commission.*

<sup>41</sup>We asked open-ended questions in our interviews with state, local, and tribal officials to identify their specific challenges in accessing FEMA assistance for wildfires. We did not ask every official in every interview about each of the specific challenges discussed in this report.

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requirements changed.<sup>42</sup> The Commission report also stated that the time-intensive and burdensome processes involved with FEMA disaster relief and hazard mitigation can contribute to protracted timelines in deploying important recovery funding to communities in need.<sup>43</sup>

We have previously reported on challenges communities faced using FEMA programs for hazard mitigation, including for wildfires.<sup>44</sup> For example, in February 2021, we reported on challenges state and local officials faced when applying for FEMA hazard mitigation grants, including complexity and length of the applications.<sup>45</sup> We recommended that FEMA take steps to reduce the complexity of its hazard mitigation grant programs. In response to this recommendation, FEMA reported taking actions to allow applicants to apply for funding more easily and reduce award time frames. As a result of these actions, this recommendation was closed as implemented.

FEMA officials described recent actions and ongoing initiatives to provide assistance more quickly and reduce administrative burdens for some of its assistance programs.

- FEMA made more projects eligible to follow a streamlined process and began providing additional technical assistance to reduce administrative burdens and time frames for its Public Assistance program. In August 2022, FEMA increased the threshold of small projects—which have fewer requirements than large projects—from

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<sup>42</sup>In one of these cases, an applicant said they had to redo the required environmental assessment, because it was determined to no longer be valid before the application process was complete. According to DHS policy, DHS components must decide whether an environmental assessment is still valid for the proposed action if the action has not been implemented within one budget cycle, and no more than three years from the date of the environmental assessment when there is a finding of no significant impact. DHS, *Instruction Manual 023-01-001-01, Revision 01, Implementation of the National Environmental Policy Act (NEPA)*, (Washington, D.C.: Nov. 2014).

<sup>43</sup>*On Fire: The Report of the Wildland Fire Mitigation and Management Commission*.

<sup>44</sup>See GAO, *Hurricane Sandy: An Investment Strategy Could Help the Federal Government Enhance National Resilience for Future Disasters*, [GAO-15-515](#) (Washington, D.C.: July 30, 2015).

<sup>45</sup>GAO, *Disaster Resilience: FEMA Should Take Additional Steps to Streamline Hazard Mitigation Grants and Assess Program Effects*, [GAO-21-140](#) (Washington, D.C.: Feb. 2, 2021). See also, GAO, *Disaster Recovery: Actions Needed to Improve the Federal Approach*, [GAO-23-104956](#) (Washington, D.C.: Nov. 15, 2022).



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about \$140,000 to \$1 million.<sup>46</sup> FEMA also aimed to reduce the administrative burden for small projects by streamlining requirements. For example, FEMA now accepts the applicant's certifications for estimates of damages and work, instead of requiring full or detailed documentation. Additionally, FEMA hired a research firm to study opportunities for streamlining Public Assistance. In response to this study, in March 2024 FEMA officials stated they initiated a pilot program to provide additional technical assistance for projects that FEMA identifies as more complicated or that impact underserved communities.

- FEMA officials stated that they conducted analyses of HMGP and the Building Resilient Infrastructure and Communities programs to identify and address timeliness concerns. As of July 2024, the agency was in the process of reviewing those analyses and developing plans to address their findings, according to officials. Officials said FEMA also has working groups focused on improving its delivery of assistance for wildfires, including one tasked with evaluating recommendations from recent assessments of FEMA's wildfire assistance, such as the Commission report. As of November 2024, officials stated they are using these recommendations to inform ongoing policy updates across FEMA's hazard mitigation assistance programs.
- FEMA has solicited and incorporated feedback from applicants and recipients of Public Assistance and Individual Assistance to improve program delivery. For example, under FEMA's strategic plan, the agency tracks the percentage of applicants satisfied with the simplicity of Public Assistance and the Individuals and Households Program, a major component of Individual Assistance.<sup>47</sup> Officials said these surveys inform FEMA's policies and strategies. For example, a FEMA press release stated that it made the March 2024 Individual Assistance program changes in response to decades of survivor feedback, and requests from state partners and members of Congress for simpler programs for disaster survivors. Among these changes, FEMA removed a requirement that survivors apply for a U.S. Small Business Administration disaster loan before being

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<sup>46</sup>87 Fed. Reg. 47,359 (Aug. 3, 2022).

<sup>47</sup> 2022-2026 FEMA Strategic Plan: Building the FEMA our Nation Needs and Deserves.

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considered for certain types of financial assistance from FEMA.<sup>48</sup> Previously, FEMA required that survivors apply for these loans and either be denied or continue to have unmet needs before receiving assistance for personal property and other non-housing losses. We have reported that survivors experienced significant confusion over this prior requirement.<sup>49</sup>

These recent and ongoing efforts demonstrate that FEMA is aware of timeliness issues and administrative burdens in these assistance programs and is working to address them. While these recent efforts are positive steps, it is too early to assess their impact on reducing administrative burdens and increasing timeliness of reimbursements for wildfire-affected communities.

## Debris Removal

As we have previously reported, wildfires create significant debris removal challenges for state and local jurisdictions, and the process is often more costly and complicated than for other types of disasters.<sup>50</sup> As our data analysis indicates, FEMA obligated a higher proportion of Public Assistance funds for debris removal for wildfires than non-wildfires during fiscal years 2019 through 2023. Wildfire debris, including hazardous waste removal and private property debris, continues to pose challenges for federal, state, and local officials. For example, figure 8 describes the complicated nature of debris removal state and federal officials reported after the August 2023 Lahaina wildfire on the island of Maui, Hawaii, due to the volume of debris and presence of hazardous materials.

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<sup>48</sup>See 89 Fed. Reg. 3990 (Jan 22, 2024). For more information, see GAO, *Disaster Recovery: Additional Actions Needed to Identify and Address Potential Recovery Barriers*, [GAO-22-104039](#), (Washington, D.C.: Dec. 15, 2021) and *Disaster Loan Program: SBA Should Include Key Issues in Its Review of How Program Affects Underserved Communities*, [GAO-24-106682](#), (Washington, D.C.: Nov. 30, 2023).

<sup>49</sup>See *Disaster Assistance: Additional Actions Needed to Strengthen FEMA's Individuals and Households Program*, [GAO-20-503](#) (Washington, D.C.: Sept. 30, 2020). In September 2020, we recommended that FEMA work with the U.S. Small Business Administration to identify options to simplify and streamline the disaster assistance application process for survivors. FEMA addressed our recommendation by removing the requirement that applicants must apply for a U.S. Small Business Administration loan before being considered for FEMA assistance.

<sup>50</sup>[GAO-20-5](#).

**Figure 8: Wildfire Debris Removal in Lahaina, Hawaii**



Wildfires in Lahaina, Hawaii in August 2023, resulted in an estimated 400,000 cubic yards of ash and debris.

Local, state, and Federal Emergency Management Agency (FEMA) officials coordinated with the U.S. Army Corps of Engineers to offer direct federal assistance for debris removal.<sup>a</sup>



Before the U.S. Army Corps of Engineers could begin removing debris, the Environmental Protection Agency had to remove all hazardous materials and ensure the property is safe for entry.<sup>b</sup> FEMA reported that the Environmental Protection Agency removed more than 220 tons of hazardous materials—such as paints, solvents, oils, pesticides—as well as 30 tons of lithium batteries from electric vehicles and power walls from the burn zone.



The U.S. Army Corps of Engineers constructed a temporary disposal site for staging the debris, and as of July 2024, Maui County anticipated that the cleanup and transfer of ash and debris from Lahaina to the temporary disposal site would continue into 2025. As of July 2024, FEMA had obligated nearly \$950 million for debris removal for the Maui wildfires.

Source: GAO summary of FEMA and Maui County documentation; GAO photos. | GAO-25-106862

<sup>a</sup>Per FEMA policy, private property debris removal may be eligible for Public Assistance if the debris on private property is of such magnitude that it poses a threat to public health and safety. The U.S. Army Corps of Engineers is the lead agency for the emergency support function for public works and engineering, which includes debris removal.

<sup>b</sup>See GAO, Household Hazardous Waste Removal: EPA Should Develop a Formal Lessons Learned Process for Its Disaster Response, [GAO-22-104276](#) (Washington, D.C.: Mar. 17, 2022).

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FEMA issued two guidance memos in 2022 to address debris removal issues, which may help wildfire-affected communities recover more quickly. In September 2022, FEMA issued a memo simplifying Public Assistance policies on debris removal and utility restoration.<sup>51</sup> The changes were aimed at providing additional flexibility in how localities can carry out that work. Additionally, in October 2022, FEMA issued the Public Assistance Wildfire Policy Guidance Memorandum, which addressed issues related to debris and hazardous tree removal, among other things.<sup>52</sup> One provision of this memo established that entities do not need permission from FEMA to start private property debris removal; however, FEMA must determine the work is eligible for Public Assistance. While FEMA made these changes in response to wildfire debris challenges, the provisions are applicable to all hazards.

FEMA officials told us in November 2024 that they plan to continue working on debris removal issues over the next year. For example, officials said they plan to devise formulas that applicants can use to estimate debris removal volume, which may enable applicants to provide required information to FEMA more easily. While FEMA's ongoing efforts are positive steps, it is too soon to assess how effective these changes will be at addressing existing wildfire debris removal challenges.

## Post-Wildfire Housing

Providing effective and affordable temporary and interim housing for disaster survivors is a long-standing challenge, particularly following wildfires. Wildfires tend to totally destroy structures and leave behind contaminated ground, limiting short-term and interim housing options and requiring a longer rebuilding period. Until the land is safe for habitation, FEMA, state, and local officials must find space for temporary housing units outside the burn zone, where there is access to non-contaminated utilities.

FEMA officials also said they face limitations to their authorities regarding housing. Under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), FEMA may provide temporary housing for up to 18 months, unless an extension would be in the public interest due

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<sup>51</sup>FEMA, *Simplifying the Public Assistance Program, Part 2*, (Washington D.C.: September 2022).

<sup>52</sup>FEMA, *Public Assistance Wildfire Policy Guidance*, (Washington D.C.: October 2022).

### Post-Wildfire Housing in Maui, Hawaii

Federal Emergency Management Agency (FEMA) officials said finding housing for Maui wildfire survivors would be a top priority and a major challenge during recovery. The August 2023 wildfires damaged or destroyed nearly 2,000 housing structures in the town of Lahaina. The state of Hawaii had declared a housing emergency in July 2023 to help address the housing crisis across the state. Additionally, Hawaii had the highest cost of living of any state in 2022, according to data from the Council for Community and Economic Research. Maui also has a large short-term vacation rental market, which has limited available housing options for survivors. Further, FEMA Region 9 officials told us that Maui County prohibits housing units with wheels. This prevented FEMA from using mobile homes or trailers, its usual temporary housing units.

In May 2024, FEMA Region 9 officials said they considered factors such as speed of housing availability, cost, and the effect on longer-term housing when identifying interim housing options. FEMA has primarily used Direct Leasing to house eligible survivors in Maui, according to these officials. Officials said Direct Lease is faster than other options and can help keep eligible survivors closer to their communities. Officials said it was initially difficult to obtain enough Direct Lease properties to meet demand, so Hawaii offered tax breaks to incentivize landlords to convert their vacation rentals into longer-term rentals for eligible survivors. Additionally, FEMA coordinated with other federal, state, and local authorities to evaluate potential sites for constructing Alternative Temporary Transportable Housing Units, or modular units. Officials stated that these alternative units do not have much precedence, as FEMA usually relies on trailers and manufactured homes. As of July 1, 2024, FEMA had obligated \$301.3 million and expended \$125.6 million in Individual Assistance for this disaster, according to FEMA officials.

Source: GAO interviews with FEMA and Maui County documentation. | GAO-25-106862

to extraordinary circumstances.<sup>53</sup> FEMA officials said 18 months is not feasible for acute wildfires because of the total destruction and levels of trauma caused. Additionally, disasters exacerbate pre-disaster shortages of affordable housing, which is particularly challenging for communities lacking ample rental properties outside the footprint of the wildfire.<sup>54</sup> The 2023 wildfires in Maui exemplify these challenges; see sidebar.

FEMA has taken some initial steps to improve its assistance to survivors and address post-disaster housing challenges for all hazards, including wildfires.

- **Direct Housing Implementation Teams.** In October 2023, FEMA officials told us they were developing full-time Direct Housing Implementation Teams that will be dedicated to planning, permitting, and mobilizing temporary housing units for disaster declarations. Prior to establishing permanent teams focused on housing, FEMA generally deployed FEMA reservists, or on-call staff members, to perform these tasks for a given disaster. As of November 2024, FEMA was in the process of hiring staff to fill two national-level teams and teams in Regions 4 and 9. Some staff had onboarded and started training or pre-planning activities. According to FEMA, staff already hired for this effort for the national-level teams and Region 4 team were supporting disaster housing efforts in response to Hurricanes Helene and Milton. Additionally, FEMA was working to finalize updates to its Direct Housing Guide and develop standard operating procedures for the Direct Housing Implementation Teams.
- **Pre-Disaster Housing Initiative.** In November 2023, FEMA and the U.S. Department of Housing and Urban Development completed a Pre-Disaster Housing Initiative pilot with four states that emphasized advanced planning for post-disaster sheltering and housing needs. Over the 6-month pilot, FEMA, the Department of Housing and Urban Development, and state partners met regularly, according to a FEMA bulletin. The bulletin stated that the pilot improved coordination and collaboration across interstate organizations on the critical issues facing emergency management and housing. FEMA and the Department of Housing and Urban Development publicly released a

<sup>53</sup>42 U.S.C. § 5174(c)(1)(B)(iii).

<sup>54</sup>GAO-20-5. The *National Disaster Housing Strategy* defines interim housing as that which covers the gap between immediate, short-term sheltering and the return of disaster survivors to permanent homes.

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joint report and additional guidance based on this pilot in July 2024.<sup>55</sup> FEMA stated that a second cohort of states will engage with FEMA and the Department of Housing and Urban Development to boost their housing recovery capabilities. FEMA officials said that state capacity may limit the number of states able to participate in the initiative because states face competing priorities and may not have enough resources to participate.

- **Updates to Individual Assistance.** FEMA updated its Individual Assistance program for disasters declared on or after March 22, 2024. These updates aim to provide quicker access to needed funds, expanded eligibility for property and home repairs, and an easier application process for survivors.<sup>56</sup>

While FEMA’s ongoing efforts are positive steps, it is too early to assess to what extent they will improve FEMA’s delivery of post-wildfire housing. FEMA officials also emphasized that state and local governments have a responsibility to better plan how they will house wildfire survivors before a disaster. Further, FEMA officials recognized that state capacity varies, with some having limited ability to participate in pre-disaster planning initiatives, such as the pre-disaster housing pilot program. The Commission report also made recommendations and, over the last few years, members of Congress have introduced legislation to address post-wildfire housing issues.

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## Some of FEMA’s Current Processes Hinder Post-Wildfire Mitigation Efforts

### FEMA Does Not Have a Program for Immediate Post-Wildfire Mitigation

FEMA does not have an assistance program that enables communities to conduct more timely post-wildfire mitigation, which could help prevent future disasters by addressing wildfire impacts on vegetation and soil

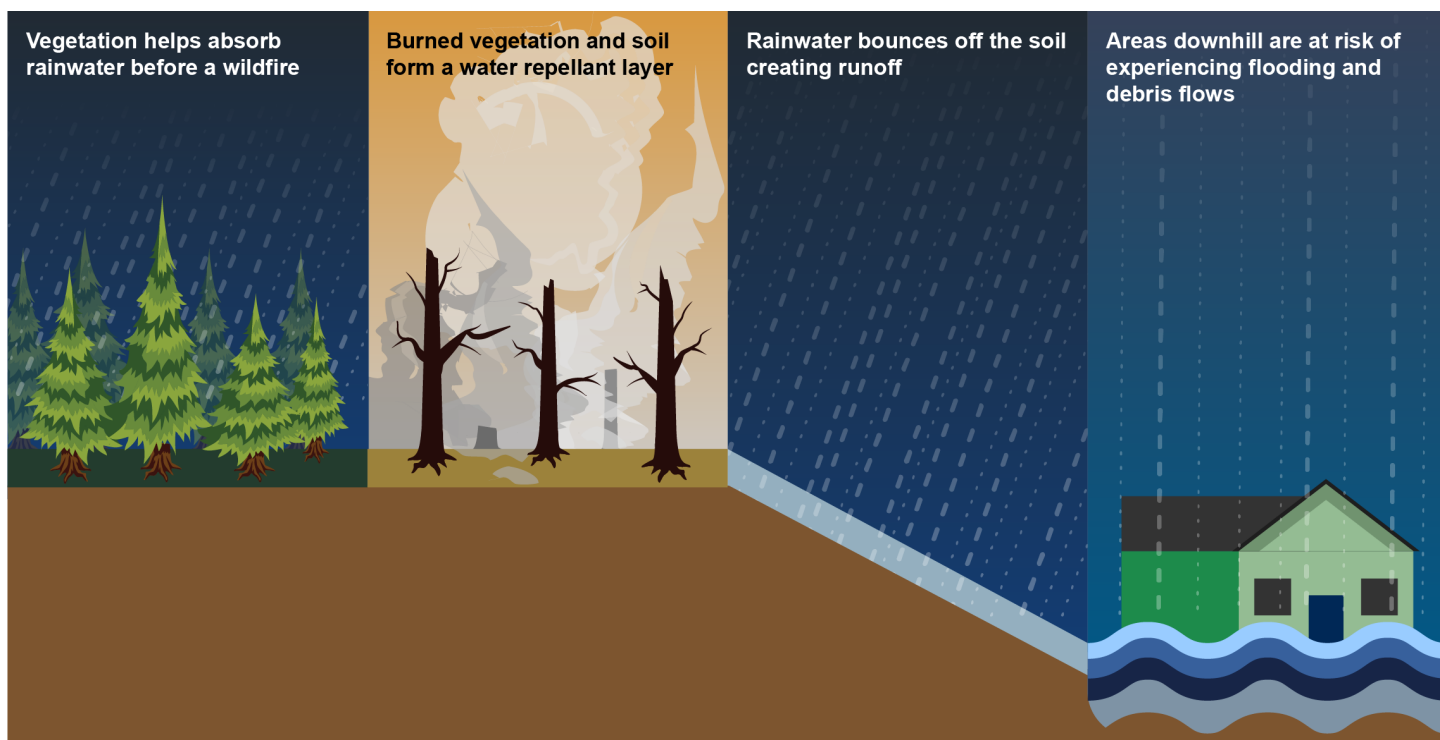
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<sup>55</sup>FEMA and Department of Housing and Urban Development, *Pre-Disaster Housing Planning Initiative*, (Washington D.C.: July 2024). FEMA and the Department of Housing and Urban Development also released a Pre-Disaster Housing Planning Guide, planning checklist, and resource timeline and compendium.

<sup>56</sup>See 89 Fed. Reg. 3990 (Jan. 22, 2024). As part of these changes, Serious Needs Assistance replaced the Critical Needs Assistance Program, which was provided based on a disaster-by-disaster evaluation. Serious Needs Assistance will be available in all disasters receiving Individual Assistance, which provides assistance to eligible individuals and households who have uninsured or underinsured necessary expenses and serious needs as a direct result of a declared disaster.

conditions.<sup>57</sup> Wildfires destroy vegetation and damage soil, and fires that burn at high severity can also produce water repellant soils. If not addressed quickly, this can make landscapes susceptible to flooding, erosion, and debris flows—fast-moving landslides that destroy objects in their paths and often strike without warning, as shown in figure 9. These issues can negatively affect life and property on land downstream by reducing water quality, damaging roads, and threatening homes and other structures. Proactively engaging in mitigation activities such as soil stabilization and erosion control measures, including reseeding and planting, can help communities reduce downstream risks that could lead to another disaster.

**Figure 9: Example of How Wildfires Can Affect Landscapes**



Source: GAO analysis of Federal Emergency Management Agency and the National Weather Service documentation. | GAO-25-106862

<sup>57</sup>In some cases, another federal program—the Emergency Watershed Protection Program administered by the U.S. Department of Agriculture’s Natural Resources Conservation Service—may assist communities with conducting immediate post-fire mitigation. See *Emergency Watershed Protection: Assistance Program Helps Meet Post-Disaster Needs and Could Be Improved with Additional Guidance*, [GAO-22-104326](#) (Washington, D.C.: Oct. 28, 2021).

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**FEMA Hazard Mitigation Assistance Eligible Soil Stabilization and Erosion Control Activities**

Post-wildfire flooding prevention and sediment reduction measures:

- Reforestation, restoration, and/or soil stabilization
- Ground cover vegetation re-establishment (e.g., seeding and mulching)
- Erosion prevention measures on slopes
- Prevention measures for flash flooding resulting from runoff (e.g., drainage dips and debris traps)

These activities are eligible for Hazard Mitigation Grant Program (HMGP), HMGP Post-Fire, and Building Resilient Infrastructure and Communities assistance, subject to meeting other grant requirements.

Source: Federal Emergency Management Agency (FEMA) documentation. | GAO-25-106862

FEMA officials said that its existing mitigation programs as currently designed; including HMGP, HMGP Post-Fire, and the Building Resilient Infrastructure and Communities program; are not the right tools for immediate post-fire mitigation. These programs allow for post-fire mitigation activities (see sidebar), but they have established lifecycles and time frames associated with pre-award, award, and post-award requirements. These timelines are not conducive to supporting mitigation efforts after wildfires, which are uniquely time-sensitive and have a high annual probability of recurrence in certain places, according to FEMA officials. As discussed previously, our data analysis for the HMGP and Building Resilient Infrastructure and Communities programs indicated that it can take years for projects to move from application to reimbursement.

Additionally, 35 percent of HMGP and HMGP Post-Fire projects associated with wildfire declarations were for wildfire-related mitigation activities. Officials from two states and National Emergency Management Association members that we spoke to stated that it is difficult to use HMGP and HMGP Post-Fire assistance for post-wildfire mitigation, such as reseeded, because the program does not provide assistance in time. Officials from one of these states said that jurisdictions within their state therefore frequently use HMGP Post-Fire funds for projects unrelated to wildfires. An official from the other state said funding for wildfire mitigation is needed but participation in HMGP for wildfire-related projects will continue to be low unless FEMA provides assistance more quickly.

To address this gap, FEMA could evaluate various options, such as changing one of its existing mitigation assistance programs or establishing a new program. For example, the Commission report and FEMA's National Advisory Council recommended expanding the support available through the FMAG program to allow for post-wildfire mitigation. According to FEMA officials, doing so would require statutory and regulatory changes to reimburse most soil stabilization activities.

FMAG authorities for providing post-wildfire mitigation are limited under statute and regulation, according to FEMA officials. The Stafford Act authorizes FEMA to provide assistance for the "mitigation, management, and control" of wildfires that may become major disasters.<sup>58</sup> FEMA regulations define "mitigation, management, and control" to mean activities undertaken, generally during the incident period of a declared fire, to minimize immediate adverse effects and to manage and control

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<sup>58</sup>42 U.S.C. § 5187(a).



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the fire.<sup>59</sup> Further, FEMA regulations state that costs related to recovery activities—such as seeding, planting operations, and erosion control—are ineligible for reimbursement.<sup>60</sup> However, soil stabilization and erosion control measures to prevent flooding, erosion, and debris flows are often needed after a fire no longer poses a threat.

The Commission report suggested that expanding FMAG authorities beyond the current focus on fire management and control would help address the significant need for post-fire mitigation and recovery funding. Proactively conducting post-wildfire mitigation activities can help communities reduce downstream risks that could lead to another disaster.

The *National Disaster Recovery Framework* states that successful recovery upholds the values of timeliness and flexibility in coordinating and efficiently conducting recovery activities and delivering assistance.<sup>61</sup> It also minimizes delays and lost opportunities. Further, it ensures recovery plans, programs, policies, and practices are adaptable to meet unforeseen, unmet, and evolving recovery needs. Additionally, the *National Mitigation Framework* calls for reducing long-term vulnerability.<sup>62</sup> This consists of building and sustaining resilient systems, communities, and critical infrastructure and key resource lifelines to reduce their vulnerability to threats and hazards by lessening the likelihood, severity, and duration of the adverse consequences. It also includes initiatives and investments that reduce response and recovery resource requirements in the wake of a disaster or incident.

FEMA officials stated that they have considered some options for how current programs could be used for this purpose, but regulatory and/or statutory barriers have prevented the agency from taking further action. As the lead federal agency for disaster recovery, FEMA is best positioned to identify ways to address this gap, which may include modifying an existing program or establishing a new program. Such changes may necessitate amending FEMA regulations and/or developing a legislative proposal for any necessary statutory changes, depending on which option FEMA pursues. Taking steps to provide immediate post-wildfire mitigation

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<sup>59</sup>44 C.F.R. § 204.3. The FMAG incident period is defined as the time interval during which the declared fire occurs.

<sup>60</sup>44 C.F.R. § 204.43(b).

<sup>61</sup>*National Disaster Recovery Framework*.

<sup>62</sup>DHS, *National Mitigation Framework*, (Washington D.C.: June 2016).

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Opportunities Exist to Facilitate More Timely Environmental Reviews for Post-Wildfire Mitigation

assistance could better position FEMA to help foster more resilient communities and reduce the future demand on federal resources by mitigating post-wildfire flooding, erosion, and debris flows.

FEMA has pursued some, but not all, opportunities to facilitate more timely environmental reviews—required by the National Environmental Policy Act (NEPA)—for mitigation projects that could reduce post-wildfire risks.<sup>63</sup> Officials from two counties and two states, and our prior work identified delays associated with the NEPA environmental review process.<sup>64</sup> The 2022 *FEMA National Advisory Council Annual Report* stated that environmental reviews have become lengthy for hazard mitigation assistance projects, especially for pre- and post-wildfire mitigation.<sup>65</sup> Improving the efficiency of the environmental review process for post-wildfire mitigation projects is also important in facilitating more timely post-wildfire mitigation assistance.

Assistance provided via FEMA’s hazard mitigation assistance programs is subject to NEPA, which requires federal agencies to assess the environmental effects of proposed major federal actions prior to making decisions.<sup>66</sup> Those effects include impacts on social, cultural, economic, and natural resources.<sup>67</sup> Agencies must determine whether an environmental assessment or environmental impact statement is required to assess the project’s effects on the quality of the human environment.<sup>68</sup> Agencies are also to establish categorical exclusions in their NEPA implementing procedures.<sup>69</sup> These are categories of actions that normally do not have significant effect on the human environment, individually or in the aggregate. If a proposed action is covered by an agency’s categorical exclusion, it generally does not require preparing an environmental assessment or environmental impact statement. Agencies are still

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<sup>63</sup>Pub. L. No. 91-190, 83 Stat. 852 (1970) (codified as amended at 42 U.S.C. §§ 4321-47).

<sup>64</sup>[GAO-21-140](#), [GAO-15-515](#).

<sup>65</sup>FEMA National Advisory Council, *FEMA National Advisory Council Annual Report*, (Washington, D.C.: Nov. 2022).

<sup>66</sup>See 42 U.S.C. § 4336.

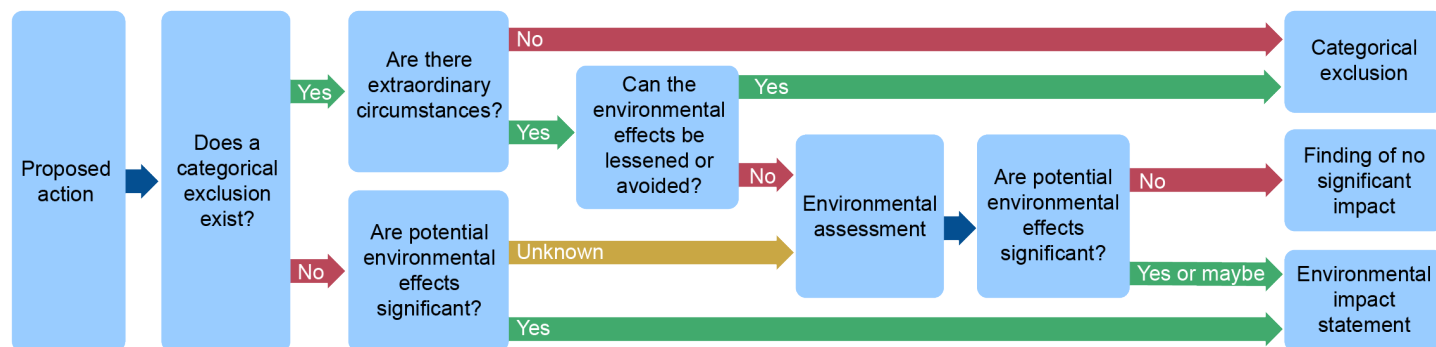
<sup>67</sup>See 40 C.F.R. § 1508.1(i).

<sup>68</sup>Agencies are to determine whether the proposed action is not likely to have significant effects or the significance of the effects is unknown, in which case they must conduct an environmental assessment, or whether it is likely to have significant effects, in which case they must conduct an environmental impact statement. See 40 C.F.R. § 1501.3(c).

<sup>69</sup>40 C.F.R. § 1501.4.

required to assess whether there are extraordinary circumstances that may cause a proposed action to have a significant effect and warrant further environmental review, as shown in figure 10.<sup>70</sup>

**Figure 10: Process for Implementing the National Environmental Policy Act's (NEPA) Requirements**



Source: GAO analysis of NEPA and Council on Environmental Quality's implementing regulations. 42 U.S.C. § 4336; 44 C.F.R. part 1501. | GAO-25-106862

Notes: Categorical exclusions are categories of actions that normally do not have significant effect on the human environment and are incorporated into agencies' NEPA implementing regulations and procedures. Agencies are still required to assess whether there are extraordinary circumstances that may cause a proposed action to have a significant effect and warrant further environmental review. 40 C.F.R. § 1501.4. For example, extraordinary circumstances could be related to the presence of threatened or endangered species. Environmental assessments are prepared for actions not likely to have a significant effect or for which the significance of the effects is unknown and are used to support an agency's determination of whether to prepare an environmental impact statement or a finding of no significant impact. Environmental impact statements are prepared for actions likely to have significant effects and contain detailed analyses and evaluations of the impacts of a proposed project and reasonable alternatives to the proposed action. 44 C.F.R. part 1501.

To establish categorical exclusions, agencies submit substantiation packages with proposed or revised categorical exclusions to the Council on Environmental Quality, which oversees agencies' NEPA implementation.<sup>71</sup> In their proposal, agencies must demonstrate that the set of actions under consideration do not individually or cumulatively have a significant effect on the human environment. For example, agencies may assess the environmental effects of previously implemented or ongoing actions, such as through prior environmental assessments that consistently found no significant impacts. Agencies may also substantiate a categorical exclusion based on another agency's experience with a

<sup>70</sup>If there are no extraordinary circumstances or the agency modifies the proposed action to avoid the potential to result in significant effects, the agency may apply the categorical exclusion. Id.

<sup>71</sup>NEPA created the Council on Environmental Quality within the Executive Office of the President. 42 U.S.C. §§ 4342-47. The Council on Environmental Quality oversees NEPA implementation.

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comparable categorical exclusion and the record developed by the other agency when establishing the categorical exclusion.<sup>72</sup> In consultation with the Council on Environmental Quality, agencies publish their proposed categorical exclusions for public comment and then incorporate them into their NEPA procedures.

Other assessments of FEMA's programs and processes have identified categorical exclusions as a potential method to increase the timeliness and efficiency of environmental reviews for wildfire mitigation actions. For example, the 2022 National Advisory Council report attributed lengthy time frames for environmental reviews, particularly for wildfire mitigation, as often due to the lack of applicable categorical exclusions, requiring environmental assessments that can take years to complete.<sup>73</sup>

Additionally, the Commission report recommended that FEMA expand an existing categorical exclusion or establish a new one that would cover post-wildfire mitigation activities such as soil stabilization and erosion control.<sup>74</sup> Lastly, three of the seven states we interviewed told us it would be helpful for FEMA to have a categorical exclusion for more wildfire mitigation projects.

DHS establishes categorical exclusions that apply to FEMA and other DHS components. There are several paths DHS could take to pursue a categorical exclusion for post-wildfire soil stabilization activities, including following the process to establish a new categorical exclusion, expand an existing one, or adopt one from another agency:

**Establishing a new categorical exclusion.** DHS could pursue establishing a new categorical exclusion to cover post-wildfire mitigation activities based on the findings of past environmental assessments. For example, since late 2019, FEMA has developed at least four programmatic environmental assessments that found no significant environmental impacts for a range of post-wildfire soil

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<sup>72</sup>See Council on Environmental Policy, *Guidance on Establishing, Applying, and Revising Categorical Exclusions*, 75 Fed. Reg. 75,628, 75,634 (Dec. 6, 2010).

<sup>73</sup>FEMA National Advisory Council Annual Report.

<sup>74</sup>*On Fire: The Report of the Wildland Fire Mitigation and Management Commission.*

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stabilization mitigation actions eligible for FEMA assistance.<sup>75</sup> The findings in these assessments, as well as project specific assessments for past soil stabilization and erosion control projects, may help support a new categorical exclusion.

**Expanding an existing categorical exclusion.** DHS could pursue expanding an existing categorical exclusion to include these post-wildfire mitigation activities. For example, the Commission report recommended that DHS could expand its categorical exclusion for “federal assistance for planting of indigenous vegetation” to include post-wildfire soil stabilization and erosion control activities.

**Adopting another agency’s categorical exclusion.** Other federal agencies, such as the U.S. Forest Service, the Department of the Interior, and the Bureau of Land Management, have categorical exclusions that cover certain soil stabilization activities after a wildfire. The Council on Environmental Quality’s NEPA regulations, amended in May 2024, provide the option for agencies to adopt and apply another agency’s categorical exclusion to a proposed action or a category of actions.<sup>76</sup> Therefore, DHS could pursue adopting the categorical exclusion of one of these other agencies.

FEMA officials agree that a categorical exclusion for post-wildfire soil stabilization and erosion control activities would be beneficial, and the agency has begun to assess its options for adopting a categorical exclusion from another agency to cover such activities. FEMA officials said they have identified several categorical exclusions related to post-wildfire soil stabilization at other agencies, and the agency is currently evaluating the feasibility of adopting them. To do so, as stated in regulation, DHS will need to work with the agency that established the categorical exclusion and follow the process to adopt

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<sup>75</sup>Programmatic NEPA reviews help an agency identify environmental impacts of proposed policies, plans, programs, or projects for which subsequent actions will be implemented. See FEMA: *Programmatic Environmental Assessment for the State of New Mexico Watershed Resiliency and Post-Wildfire Treatment Projects*, (Denton, TX: Oct. 2022); *Final Programmatic Environmental Assessment: Wildfire Hazard Mitigation Projects in the State of Montana*, (Denver, CO: Sept. 2019); *Final Programmatic Environmental Assessment: Wildfire Hazard Mitigation Projects in the State of Wyoming*, (Denver, CO: Sept. 2019); *Final Programmatic Environmental Assessment: Wildfire Hazard Mitigation Projects in the State of Utah*, (Denver, CO: Sept. 2019).

<sup>76</sup>40 C.F.R. § 1501.4(e). In May 2024, the Council on Environmental Quality issued new regulations implementing NEPA, including section 109, which was enacted as part of the Fiscal Responsibility Act of 2023. 89 Fed. Reg. 35,442 (May 1, 2024). Section 109 of NEPA allows an agency to adopt a categorical exclusion listed in another agency’s NEPA procedures in certain circumstances and describes procedural requirements for such adoption. 42 U.S.C. § 4336c.

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and apply the categorical exclusion to a proposed action or category of actions.<sup>77</sup> DHS officials said that the department is pursuing the option to adopt another federal agency's categorical exclusion because the process is the most streamlined method for expanding the department's available categorical exclusions.

The Council on Environmental Quality recommends that agencies anticipating long-term use of an adopted categorical exclusion establish the categorical exclusion in their own NEPA procedures. As such, adopting and applying another agency's categorical exclusion to a category of actions could be a good interim solution until an agency establishes a new categorical exclusion or modifies an existing one.<sup>78</sup>

The Stafford Act directs using the shortest existing applicable process under NEPA when providing assistance under HMGP.<sup>79</sup> According to Council on Environmental Quality guidance, categorical exclusions provide an efficient tool to complete the environmental review process and can reduce paperwork and delay. The guidance further states that categorical exclusions are the most frequently employed method for NEPA compliance and appropriate reliance on categorical exclusions provides reasonable and effective analysis for many proposed actions.<sup>80</sup> Following the process to expand, establish, or adopt a categorical exclusion for wildfire mitigation activities that includes post-wildfire soil stabilization and erosion control measures would better position DHS to help FEMA provide more timely post-wildfire mitigation assistance. Establishing such a categorical exclusion could improve the agency's ability to assist communities in mitigating risks from post-wildfire impacts, such as flooding and landslides, that threaten lives and property.

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<sup>77</sup>To adopt and apply a categorical exclusion listed in another agency's NEPA procedures to a proposed action or a category of proposed action, agencies must: (1) Identify the categorical exclusion listed in another agency's NEPA procedures that covers its proposed action or a category of proposed actions; (2) Consult with the agency that established the categorical exclusion; (3) Provide public notification of the categorical exclusion that the agency is adopting; (4) In applying the adopted categorical exclusion to a proposed action, evaluate the proposed action for extraordinary circumstances, and (5) Publish the documentation of the application of the adopted categorical exclusion. 44 C.F.R. § 1501.4(e).

<sup>78</sup>89 Fed. Reg. 35,442, 35,475 (May 1, 2024).

<sup>79</sup>42 U.S.C. § 5170c(d)(1)(B).

<sup>80</sup>*Guidance on Establishing, Applying, and Revising Categorical Exclusions.*

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## Opportunities Exist to Further Enhance FEMA's Management of the FMAG Program

### FEMA Has Not Collected Feedback on the FMAG Program

State, local, and tribal officials described a range of challenges associated with the FMAG program, including administrative burdens and difficulty meeting cost threshold requirements for grant eligibility. However, unlike for some other assistance programs, FEMA does not collect ongoing, nationwide feedback from FMAG recipients that can be incorporated into FMAG policy, as applicable.

Officials from five of seven states, six of 11 counties, and two of four Tribes we spoke to described the FMAG program as administratively burdensome. For example, county officials cited challenges related to compiling the required information to request the declaration, the amount of work required to seek reimbursements from associated grants, and a lack of understanding the eligibility requirements for FMAG declarations. Officials from one county said that their all-volunteer fire fighting staff do not have the resources to help the county complete the paperwork while responding to an active fire. Additionally, an official from another county said that the FMAG process would be difficult to navigate for applicants with less experience.

Officials from two states and two counties said it was a challenge meeting the FMAG cost thresholds, which are required for fire management assistance grant eligibility.<sup>81</sup> A state must demonstrate that the wildfire meets pre-established cost thresholds for FEMA to approve the initial grant award. For example, one state and one county described the impact these thresholds have on rural communities. Specifically, the state officials noted that FEMA develops cost thresholds based on a state's population, making it difficult for rural, sparsely populated areas to meet

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<sup>81</sup>To apply for grants under an approved FMAG declaration, the state must demonstrate that it has met either the individual or cumulative fire cost threshold. The individual fire cost is based on total eligible costs for the declared fire and the cumulative fire cost is based on total eligible costs incurred during the calendar year for all declared fires and total costs incurred on non-declared wildfires. 44 C.F.R. § 204.51(b)(1). See FEMA, *Fire Management Assistance Grant Program and Policy Guide*, (Washington, D.C.: 2021) for more information.

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them, even after losing multiple homes.<sup>82</sup> The county official said expenses of a few thousand dollars may not meet cost thresholds, but these costs can be significant in rural communities. Additionally, an official from another state said it is difficult when a wildfire does not meet cost thresholds because state and local officials expend time and resources to get the declaration and submit information to FEMA, but their application is ultimately not approved.

One of FEMA's Learning Agenda principles in its *2022-2026 Strategic Plan* is to guide evidence building through evaluation. The principle states that evaluation and evidence-building findings inform and are integrated into the agency's activities, such as budgeting, program improvement, management, accountability, and the development of programs, policies, and regulatory actions.<sup>83</sup> Further, FEMA's strategic plan states that FEMA recognizes the need to ensure programs continually review and respond to feedback through feedback loops that integrate input from communities. Additionally, *Standards for Internal Control in the Federal Government* states that management should use quality information, including obtaining relevant data from internal and external sources, and process it into information that management can use to make informed decisions and evaluate the entity's performance in achieving key objectives and addressing risks.<sup>84</sup>

FEMA headquarters officials said they have not collected nationwide, ongoing feedback because the FMAG program is regionally administered, and the regions conduct working groups to obtain feedback from state officials. However, FEMA headquarters officials also stated that, although FEMA regions administer the FMAG program, FEMA headquarters has responsibility for setting nationwide FMAG policy and program direction. Additionally, neither FEMA headquarters nor the regions have a process to solicit regular feedback from local and tribal governments. Not engaging with local and tribal governments, which make up a significant percentage of FMAG recipients, could be a missed opportunity to gather information that could improve program policy. Our data analysis showed

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<sup>82</sup>The individual fire cost threshold for a state is the greater of the following: \$100,000 or five percent times \$1.07 (adjusted annually for inflation) times the state population. The cumulative fire cost threshold for a State is the greater of the following: \$500,000; or three times five percent times \$1.07 (adjusted annually for inflation) times the State population. 44 C.F.R. § 204.51(b)(2), (3).

<sup>83</sup>2022-2026 FEMA Strategic Plan: Building the FEMA our Nation Needs and Deserves.

<sup>84</sup>[GAO-14-704G](#).



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that about 41 percent of FMAG grant applicants between fiscal years 2019 and 2023 were local or tribal governments, versus state agencies (59 percent).

Officials from four counties, two Tribes, and the National Tribal Emergency Management Council said that FEMA could do more direct outreach to local or tribal governments. For example, one county official said there are not many opportunities to provide feedback directly to FEMA to support program policy changes. Another county official suggested that additional outreach to local governments may help build relationships and trust, as well as reassure local governments that their state emergency management departments have the right information. Officials from one Tribe said communication processes would be improved if FEMA communicated directly with tribal leaders.

Additionally, not soliciting feedback from FMAG recipients—including state, local, and tribal governments—is inconsistent with FEMA’s efforts to gather feedback on other programs, such as the Public Assistance program that is managed by the same program office. Under FEMA’s strategic plan, FEMA tracks the percent of applicants satisfied with the simplicity of the Public Assistance program. FEMA officials also said they survey all levels of Public Assistance applicants to gather feedback and measure customer satisfaction. They review these survey responses on an ongoing basis and have made changes in response to them, including improving FEMA’s online portal for Public Assistance, according to officials.

As FEMA’s only wildfire-specific assistance program and a first line of defense in preventing wildfire major disasters, it is important that FEMA take steps to identify and act on any challenges applicants face. Establishing a formal process to regularly collect and assess nationwide feedback from state, local, and tribal FMAG recipients and incorporating such feedback into program policy, as applicable, would help FEMA address challenges moving forward. Formal mechanisms to collect feedback could include surveys; discussion or focus groups; meetings with a sample of state, local, and tribal governments; and an anonymous online mailbox.

## FMAG Guidance Does Not Fully Clarify Some Procedures

Local officials that we spoke to described challenges related to FMAG procedures. For example, officials stated that FEMA’s guidance related to FMAG eligibility for fires burning on federal land but threatening nearby communities was not clear. This has led to confusion among affected communities and different interpretations among FEMA officials.

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Additionally, state officials described challenges related to eligibility of costs associated with in-state resources.

FEMA's FMAG guidance states that FEMA cannot fund wildfire response efforts on federal land.<sup>85</sup> However, it does not clearly state whether the agency will approve declarations for fires burning only on federal land but threatening nearby state and local communities. Fires may burn on federal land but, due to weather conditions and increased development around federally owned land, may threaten neighboring communities. These communities may incur expenses before the fire burned beyond federal boundaries for emergency protective measures like evacuating neighboring communities. For example, in 2022, Oregon requested an FMAG declaration for the Cedar Creek Fire while the fire was burning entirely on federal land near a residential community. FEMA initially denied this request. On appeal, FEMA approved the FMAG declaration, in part because Lane County, Oregon incurred significant expenses for evacuating residents, according to state officials. According to Oregon state officials, the following year the state experienced a similar fire and FEMA regional officials told them an FMAG declaration request would likely be denied but that the state could appeal.

As a result of the unclear guidance, FEMA officials have inconsistently interpreted FMAG eligibility for fires burning on federal land but threatening nearby communities. For example, officials from one region said FEMA's policy was unclear, but officials from two other regions said they would declare an FMAG in such a situation. Officials from one of those two regions said they thought that when evaluating an FMAG request, regions are to look at the area threatened rather than where a fire is currently burning. Since the FMAG program is regionally administered, differing understandings of eligibility under such scenarios could lead to disparate outcomes for communities seeking FMAG declarations in different regions.

Additionally, FEMA headquarters officials said the agency would approve an FMAG declaration if the threat of the fire to non-federal land met the declaration criteria, which include high fire danger conditions, as well as threats to lives, critical facilities, and infrastructure. The FMAG declaration would provide assistance related to eligible activities and costs, such as emergency protective measures. However, FEMA has not previously

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<sup>85</sup>FEMA regulations provide that fires fought on federal land are generally the responsibility of the federal agency that owns or manages the land. 44 C.F.R. § 204.43(e).

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clarified its policy in written guidance because an increase in fire activity in recent years has drawn more attention to the issue of fires burning on federal land but threatening nearby communities.

Officials from three counties and two states that we spoke to said FEMA could do more to help communities pre-position resources to respond to wildfires. For example, officials from two states described the lack of funding for in-state pre-positioning as a gap in FEMA assistance for wildfires. Under FEMA's current *FMAG Program and Policy Guide* (FMAG guide), state or local government-owned resources pre-positioned within the same state are not eligible for reimbursement. However, out-of-state, federal, and international resources may be eligible when those resources are used in response to a declared fire.<sup>86</sup> This policy does not account for the size and difficulty of moving resources across large western states. For example, Idaho state officials described challenges associated with state resources located up to 7 hours away being considered local and thus ineligible for reimbursement. The Commission report also stated the importance of reimbursement for pre-positioning fire responders.

FEMA officials stated that the issue of reimbursing eligible in-state pre-positioning costs came up after FEMA issued its last FMAG guide update. Additionally, officials agreed that reimbursing for eligible in-state pre-positioning costs would be beneficial, but added that FEMA had previously interpreted its authority as barring reimbursement for in-state pre-positioning costs. Officials thought providing reimbursement for these costs required a regulatory change and had begun the process of requesting new rulemaking. However, FEMA's Office of Chief Counsel later determined that FEMA did have the flexibility to adjust its policy without updating the regulation.

FEMA program officials said they plan to 1) document how regions should handle FMAG requests for fires burning on federal land but threatening nearby communities, and 2) provide written guidance on pre-positioning of in-state resources in the next FMAG guide update, which is expected to be published by November 2025. According to headquarters officials, they told the regions they would approve in-state pre-positioning costs on an ad hoc basis until they address this issue in the update. Additionally, headquarters officials stated they verbally informed regional FMAG points

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<sup>86</sup>Pre-positioning is moving existing fire prevention or suppression resources from an area of lower fire danger to one of higher fire danger in anticipation of an increase in fire activity likely to constitute the threat of a major disaster.

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## Enabling Tribal Governments to Request FMAG Declarations

of contact about the agency's position on approving FMAG declarations for wildfires burning on federal land that threaten nearby communities.

The FMAG guide states that to ensure proper implementation of the program, it is vital that those involved at any level share a common understanding of the program's policies and procedures.<sup>87</sup> Until FEMA updates program guidance with these changes, the agency lacks reasonable assurance that the policies will be carried out consistently.

FEMA's current regulations require tribal governments to request FMAG declarations through a state, rather than from FEMA directly, creating challenges for Tribes.<sup>88</sup> According to the Bureau of Indian Affairs, there were over 2,600 wildfires that originated on or near trust land in 2023. Through an FMAG declaration, FEMA can help Tribes respond to wildfires by reimbursing eligible expenses such as equipment use, repair and replacement; mobilization and demobilization activities; and tools, materials, and supplies. Officials we spoke to from two Tribes and one state said that it is important for Tribes to have the flexibility to either request an FMAG declaration directly or through the state.

There are several challenges that tribal governments may face in requesting FMAG declarations through a state. Officials from one FEMA region said this requirement adds an additional administrative layer, potentially resulting in delays and causing a tribal government to miss the application window. Additionally, a Tribe we spoke to said it was challenging to wait for disaster assistance grants to pass through the state, rather than receiving the grants directly from FEMA. Officials from the National Tribal Emergency Management Council stated that the success of the FMAG program for Tribes is dependent on the Tribe's relationship with the state. FEMA regional officials also indicated that not all Tribes and states have positive relationships, which could complicate this process. Further, prior GAO work reported that Tribes face challenges with state administration of federal programs.<sup>89</sup> For example, tribal stakeholders said that, in their view, some states do not respect tribal governments as sovereign nations and treat them like small non-

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<sup>87</sup>Fire Management Assistance Grant Program and Policy Guide.

<sup>88</sup>See 44 C.F.R. § 204.22 (providing that the Governor of a state or the Governor's Authorized Representative may submit a request for an FMAG declaration); 44 C.F.R. § 204.3.

<sup>89</sup>GAO, *Tribal Food Security: Opportunities Exist to Address Challenges in Federal Nutrition Programs*, [GAO-24-106218](#) (Washington, D.C.: July 29, 2024).

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profit organizations. According to tribal stakeholders, this view has discouraged Tribes from participating in these federal programs.

Further, FEMA's regulation requiring tribal governments to request an FMAG through a state is inconsistent with the process of requesting emergency and major disaster declarations, which allows for more flexibility. As of 2013, the Chief Executive of a tribal government may request an emergency or major disaster declaration directly, or a tribal government can be included in a state's request.<sup>90</sup> Officials from the National Tribal Emergency Management Council said the flexibility to request emergency or major disasters directly or through a state has been beneficial for Tribes.

FEMA's *Tribal Policy* states that FEMA acknowledges the inherent sovereignty of tribal governments, the trust responsibility of the federal government, and the nation-to-nation relationship between the U.S. Government and tribal governments.<sup>91</sup> Further, the policy requires FEMA to maintain nation-to-nation relationships, recognizing that the tribal right to self-governance stems from the inherent sovereignty of Tribes as nations. It also says that tribal governments have a unique and direct relationship with the federal government and tribal governments are not political subdivisions of states but are recognized by the U.S. as distinct sovereign entities.

FEMA's *2022-2026 National Tribal Strategy* says FEMA will support equitable opportunities for Tribes to access FEMA programs and resources.<sup>92</sup> To do so, it states that FEMA will conduct an internal review of programs and policies that may inhibit equitable Tribal Nation access to FEMA programs and resources. It also says FEMA will commit to affecting legislative, regulatory, and policy changes that will enhance tribal access. Further, the strategy states that FEMA will develop, approve, and/or revise tribal-specific legislative, regulatory, and policy priorities designed to enhance equitable access.

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<sup>90</sup>The Sandy Recovery Improvement Act of 2013 amended the Stafford Act to allow Tribes the option to request emergency and major disaster declarations directly. 42 U.S.C. §§ 5170(b), 5191(c).

<sup>91</sup>FEMA, *FEMA Policy: FEMA Tribal Policy*, FEMA Policy #305-111-1, (Washington, D.C.: Dec. 2016).

<sup>92</sup>FEMA, *2022-2026 FEMA National Tribal Strategy*, (Washington, D.C.: Aug. 2022).

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FEMA Public Assistance program officials told us they recognize the importance of this issue and had submitted a request for new rulemaking to amend the regulation in late 2022.<sup>93</sup> At that time, the agency put the review on hold while it worked to update its tribal declarations guidance for emergency and major disaster declarations.<sup>94</sup> In March 2024, officials from FEMA’s Recovery Office’s Policy Section asked officials in the Public Assistance program to resubmit the request for review. In July 2024, Public Assistance program officials said that they were working to identify other areas of the FMAG regulations that may require amendments to accommodate a new allowance for tribal governments to directly request an FMAG declaration. For example, FEMA would need to determine a comparable fire cost threshold for tribal governments and amend that requirement as appropriate, according to FEMA officials.

Amending its regulation to provide tribal governments the option to request FMAG declarations directly from FEMA would provide Tribes with more flexibility and would better enable FEMA to work with Tribes to ensure they have the capacity to respond to wildfires. Additionally, it would bring FMAG declaration procedures in line with procedures for emergency and major disaster declarations and would be consistent with FEMA’s commitment to enhance its nation-to-nation relationships with federally recognized tribal governments.

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## Conclusions

As the incidence and severity of massive wildfires increases, taking additional opportunities to ensure its programs are effective would better position FEMA to help meet this threat. FEMA is aware of some long-standing challenges with wildfire assistance, such as administrative burdens for program applicants, timeliness of reimbursements, debris removal, and post-wildfire housing. The agency has begun initial efforts intended to lessen the impacts of these complex issues, such as streamlining its debris removal policies, though it is too early to fully evaluate their effectiveness. However, FEMA has not fully assessed the need for further action in other areas of wildfire assistance.

Timely provision of resources to wildfire affected communities is key not only to recovery efforts but in the prevention of further devastation and

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<sup>93</sup>Within FEMA headquarters, the Public Assistance program office administers the FMAG program.

<sup>94</sup>FEMA released this guidance on December 4, 2024. The guidance updates FEMA’s *2017 Tribal Declarations Pilot Guidance* and provides information for tribal governments seeking emergency or major disaster declarations. See FEMA, *Tribal Declarations Interim Guidance*, FP-104-009025-001, (Washington, D.C.: Dec. 2024).

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compounding disasters. Wildfires destroy vegetation and soil, creating unique and urgent mitigation needs to prevent subsequent disasters, such as flooding and debris flows. Taking steps to provide immediate post-wildfire mitigation assistance, including establishing or adopting a categorical exclusion for post-wildfire soil stabilization and erosion control measures, could help foster more resilient communities and reduce the future demand on federal resources to address these hazards. The FMAG program—FEMA’s only wildfire-specific assistance program—is designed to support communities in preventing wildfires from becoming major disasters. State, local, and tribal communities are key partners in this effort. However, FEMA may be missing opportunities to engage with and seek feedback from these communities. Collecting, assessing, and incorporating feedback from state, local, and tribal communities into program policy would help FEMA address access challenges.

FEMA program officials have proposed other changes to improve the FMAG program. For example, FMAG program officials have proposed two updates to FMAG guidance to clarify FEMA’s position on approving FMAG declarations for fires that originate on federal land but threaten communities and provide written guidance on pre-positioning of in-state resources. However, until FEMA updates program guidance with these changes, the agency cannot ensure the policies will be carried out consistently. FEMA officials have also discussed amending FMAG regulation to allow tribal governments to request FMAG declarations directly. Doing so could help improve Tribes’ access to assistance and respect tribal sovereignty.

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## Recommendations for Executive Action

We are making a total of six recommendations to DHS and to FEMA. Specifically:

The FEMA Administrator should assess ways to provide assistance for immediate post-wildfire mitigation and take steps to provide such assistance. If FEMA determines it needs additional authorities, it should develop a legislative proposal for implementing the proposed change(s). (Recommendation 1)

The Secretary of Homeland Security should follow the process to expand, establish, or adopt a categorical exclusion for wildfire mitigation activities that includes post-wildfire soil stabilization and erosion control measures. (Recommendation 2)

The FEMA Administrator should establish a formal process to regularly collect and assess nationwide feedback from state, local, and tribal

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FMAG recipients and incorporate such feedback into program policy, as appropriate. (Recommendation 3)

The FEMA Administrator should document its position on approving FMAG declarations for fires burning on federal land but threatening nearby communities in the FMAG Program and Policy Guide. (Recommendation 4)

The FEMA Administrator should clarify eligible pre-positioning costs, including use of in-state resources, in the FMAG Program and Policy Guide. (Recommendation 5)

The FEMA Administrator should amend the FMAG regulations to provide tribal governments the option to request FMAG declarations directly from FEMA. (Recommendation 6)

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## Agency Comments and Our Evaluation

We provided a draft of this report to DHS for review and comment. DHS provided written comments, which are reproduced in appendix II. DHS concurred with five of the six recommendations and provided steps it plans to address them. Generally, these steps could address the intent of the recommendations, if implemented. DHS did not concur with the sixth recommendation to amend FMAG regulations to allow tribal governments to request FMAG declarations directly from FEMA, as discussed below. Additionally, DHS provided technical comments, which we incorporated as appropriate.

DHS concurred with the first recommendation that FEMA assess ways to provide assistance for immediate post-wildfire mitigation and take steps to provide such assistance. Specifically, DHS said FEMA will explore options within the agency's authority to expedite mitigation efforts, as well as identify gaps. After this assessment, FEMA plans to determine additional steps on how best to provide this assistance, as appropriate. These actions, if implemented, may address this recommendation. However, to the extent FEMA identifies statutory gaps to providing immediate post-wildfire mitigation assistance, it may need to develop a legislative proposal. Agencies routinely share their views on whether additional statutory authorities are needed to address issues we identify and how they plan to respond accordingly.

In response to the third recommendation, that FEMA establish a formal process to collect nationwide feedback from FMAG recipients (including sub-recipients), FEMA described ongoing and planned steps to collect such feedback. However, in our report, we discuss why FEMA's current



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methods of soliciting feedback are insufficient. Specifically, we reported that FEMA does not collect nationwide ongoing feedback and does not have a process to regularly solicit feedback from local and tribal governments.

FEMA plans to add a session on FMAG program updates to its annual Public Assistance Working Session in Maryland to implement the recommendation. FEMA says it will solicit feedback from FMAG recipients and sub-recipients during this session and use the feedback to inform FMAG program policy. While we agree this is a helpful step, we are concerned this will not fully address all the concerns raised in our report. Specifically, these sessions are intended to discuss public assistance initiatives related to emergencies and major disasters. As such, FEMA may not receive feedback from FMAG recipients and sub-recipients who have never received or do not often receive Public Assistance—which can only be authorized under emergency and major disaster declarations—and therefore would not plan to attend the Public Assistance Working Session.

Our analysis found that FEMA approved 209 FMAG declarations in fiscal years 2019 through 2023, compared to 13 major disaster and three emergency declarations. Additionally, the majority of these 225 declarations were in Western states. It may be particularly difficult for local and tribal governments with fewer emergency management resources to attend an event located across the country from their jurisdictions. We continue to believe it is important for FEMA to establish a formal process to regularly collect and assess nationwide feedback from state, local, and tribal FMAG recipients and incorporate such feedback into program policy, as applicable. FEMA estimates that it will implement this recommendation by May 2025, and we will continue to monitor FEMA's planned efforts through our recommendation follow-up process.

DHS did not concur with the sixth recommendation that FEMA amend FMAG regulations to provide tribal governments the option to request FMAG declarations directly. DHS stated that providing this option is desirable but amending the regulations would first require an amendment to section 420 of the Stafford Act. We do not agree that a statutory change is necessary for FEMA to implement the recommendation. Section 420 of the Stafford Act provides that FEMA may provide assistance to state and local governments for the mitigation,

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management, and control of certain wildfires.<sup>95</sup> It does not prescribe a process by which these entities may request or receive this assistance. Pursuant to section 420, FEMA issued regulations that establish a declaration process for FMAG similar to that for major disaster and emergency declarations.<sup>96</sup> To the extent that FEMA has the authority to establish in regulation a declaration process for the FMAG program, it should also have the authority to change that declaration process to allow tribal governments to request FMAG declarations.

Our position is consistent with what we heard from FEMA officials throughout our review. Public Assistance program officials told us they had submitted a request for new rulemaking to provide tribal governments this option in late 2022. As of July 2024, program officials told us they were working to revise the request to ensure it covered all areas of the regulations that would need to be updated to allow tribal governments to request FMAG declarations directly. We continue to believe that amending its regulation to allow tribal governments the option to request FMAG declarations directly from FEMA would better enable FEMA to work with Tribes to ensure they have the capacity to respond to wildfires and would be consistent with FEMA's commitment to enhance its nation-to-nation relationships with federally recognized tribal governments.

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We are sending copies of this report to the Secretary of Homeland Security, the FEMA Administrator, and the appropriate congressional committees. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (404) 679-1875 or [curriec@gao.gov](mailto:curriec@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last

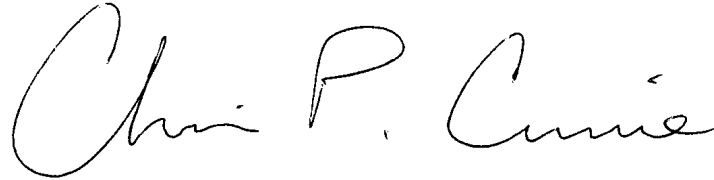
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<sup>95</sup>42 U.S.C. § 5187(a). The Sandy Recovery Improvement Act of 2013 provided that any reference to state and local governments in the Stafford Act is deemed to refer also to tribal governments. 42 U.S.C. § 5123.

<sup>96</sup>44 C.F.R. § 204.22. The FEMA Administrator may issue an FMAG declaration, whereas only the President may issue major disaster and emergency declarations.

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page of this report. GAO staff who made key contributions to this report are listed in appendix III.

A handwritten signature in black ink that reads "Chris P. Currie". The signature is written in a cursive style with a large initial "C" and a distinct "P" and "Currie".

Chris P. Currie  
Director, Homeland Security and Justice

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*List of Committees*

The Honorable Gary C. Peters  
Chairman  
The Honorable Rand Paul, M.D.  
Ranking Member  
Committee on Homeland Security and Governmental Affairs  
United States Senate

The Honorable Chris Murphy  
Chair  
The Honorable Katie B. Britt  
Ranking Member  
Subcommittee on Homeland Security  
Committee on Appropriations  
United States Senate

The Honorable Sam Graves  
Chairman  
The Honorable Rick Larsen  
Ranking Member  
Committee on Transportation and Infrastructure  
House of Representatives

The Honorable Mark Amodei  
Chairman  
The Honorable Lauren Underwood  
Acting Ranking Member  
Subcommittee on Homeland Security  
Committee on Appropriations  
House of Representatives

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# Appendix I: Objectives, Scope, and Methodology

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This report examines 1) the assistance the Federal Emergency Management Agency (FEMA) provided to wildfire-affected communities from fiscal years 2019 through 2023 and 2) any challenges affected communities face with FEMA wildfire assistance and the extent to which FEMA has taken steps to address them.

Our review examined wildfire declarations approved in fiscal years 2019 through 2023 and assistance FEMA provided to wildfire-affected communities during that time.<sup>1</sup> We selected this time period based on our prior work on FEMA wildfires, which covered wildfire disasters through November 2018, and the availability of data at the time of our audit. There were no wildfire declarations for territories during this time, so we did not include territories in the scope of our audit.

To describe FEMA's wildfire assistance, we analyzed data from five FEMA assistance programs: (1) Public Assistance, (2) Fire Management Assistance Grant (FMAG), (3) Individual Assistance, (4) Hazard Mitigation Grant Program (HMGP) and HMGP Post-Fire, and (5) Building Resilient Infrastructure and Communities. These programs represent the bulk of FEMA's assistance for wildfires from fiscal years 2019 through 2023.<sup>2</sup> For Public Assistance, FMAG, and Individual Assistance, we analyzed obligation and/or expenditure data for wildfire declarations approved in fiscal years 2019 through 2023.<sup>3</sup> For HMGP and HMGP Post-Fire, we analyzed wildfire-related projects for all declarations approved from fiscal years 2019 through 2023.<sup>4</sup> Building Resilient Infrastructure and Communities is an annual grant program, and fiscal year 2020 marked its first funding cycle. At the time of our data request in October 2023, the

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<sup>1</sup>We use the term "wildfire declarations" to refer to Fire Management Assistance Grant, major disaster, or emergency declarations for wildfire incidents. For the purposes of our report, affected communities include state, local, and tribal governments as well as individual survivors.

<sup>2</sup>Public Assistance obligation amounts are as of September 2023; FMAG obligation amounts are as of September 2023; Individual Assistance expenditure and obligation amounts are as of October or November 2023 depending on the program; HMGP and HMGP Post-Fire obligation amounts are as of October 2023; and Building Resilient Infrastructure and Communities obligation amounts are as of September 2023.

<sup>3</sup>For the majority of programs we analyzed, FEMA tracks and reports obligations data. For some Individual Assistance programs, FEMA instead tracks expenditures, such as the amounts paid to individual survivors for housing and other assistance.

<sup>4</sup>HMGP and HMGP Post-Fire grants can be used for any type of eligible hazard, not just the type of hazard covered by the declaration. For this report, we considered a project wildfire-related if applicants chose a project type containing the word "wildfire" and/or if they indicated the primary hazard type for the project was fire.

fiscal year 2023 funding cycle for this program was in process. Therefore, we analyzed Building Resilient Infrastructure and Communities obligation data for wildfire-related projects for the fiscal year 2020, 2021, and 2022 funding cycles. Additionally, we interviewed and obtained written responses from FEMA headquarters and selected regional officials about non-financial assistance the agency provides for wildfires, such as training and technical assistance.<sup>5</sup>

To assess the reliability of the data described above, we conducted electronic data testing, reviewed database documentation, and interviewed knowledgeable agency officials about the processes for collecting and maintaining these data. Based on these steps, we determined the data to be sufficiently reliable for the purposes of describing the amounts obligated or expended for these programs and the number of funded hazard mitigation projects and their status, as applicable. Final obligations and expenditures for these programs may vary, as some declarations and applications for assistance were in process at the time of our data request.

To identify communities' challenges obtaining FEMA wildfire assistance, we reviewed assessments of FEMA's wildfire assistance programs, including the Wildland Fire Mitigation and Management Commission's September 2023 report, FEMA's National Advisory Council reports, DHS performance reports, and after-action reports.<sup>6</sup> Additionally, we reviewed relevant laws and agency guidance documents, such as the program and policy guides for the programs we reviewed.

To inform both research questions, we interviewed officials about their experiences obtaining FEMA assistance for wildfires and conducted in person site visits. We selected a non-generalizable sample of 22 state, local, and tribal governments that had received FEMA wildfire assistance during fiscal years 2019 through 2022.<sup>7</sup> This included seven states, 11

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<sup>5</sup>We selected FEMA Regions 6, 8, 9, and 10 because states in these regions received the majority of wildfire declarations from fiscal years 2019 through 2023. FEMA is divided into ten geographic regions across the United States and its territories.

<sup>6</sup>Wildland Fire Mitigation and Management Commission, *On Fire: The Report of the Wildland Fire Mitigation and Management Commission*, (Sept. 2023).

<sup>7</sup>We decided not to include declarations from fiscal year 2023 because, at the time we obtained data to select locations (June 2023), fiscal year 2023 had not concluded.

counties, and four Tribes.<sup>8</sup> We selected these entities to obtain a variety of perspectives based on factors such as geographic location, number and type of wildfire declarations, and—for local governments—socio-economic status. As part of this effort, in September 2023, we visited five Washington counties that received one or more FMAG and/or wildfire major disaster declarations from fiscal years 2019 through 2022. Additionally, we visited the Nez Perce Tribe in Idaho. We conducted these site visits to obtain local and tribal perspectives on obtaining FEMA assistance; however, information from the visits is not generalizable.

We also visited Hawaii in September 2023 to observe response and initial recovery efforts after the August 2023 wildfire major disaster (disaster number 4724). We interviewed federal officials—including those from FEMA Region 9, which includes Hawaii—state officials, and local non-governmental organizations to obtain information about FEMA’s response and initial recovery efforts. We interviewed FEMA Region 9 officials again in May 2024 to receive updated information on recovery efforts.

We also interviewed external stakeholders such as the National Emergency Management Association and the National Tribal Emergency Management Council for additional information about challenges with FEMA wildfire assistance.<sup>9</sup> We interviewed FEMA headquarters and regional officials to obtain the agency’s perspective on challenges applicants and recipients face obtaining FEMA assistance for wildfires and the extent to which FEMA has taken steps to address those

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<sup>8</sup>Selected states were: California, Idaho, Oregon, Florida, Nevada, Montana, and Washington. Selected local governments were: Los Angeles County (CA), Valley County (ID), Lane County (OR), Bay County (FL), Washoe County (NV), Rosebud County (MT), Yakima County (WA), Okanogan County (WA), Kittitas County (WA), Chelan County (WA), and Whitman County (WA). Additionally, we visited the town of Malden, in Whitman County, to observe rebuilding efforts after a 2020 wildfire major disaster (DR-4584). We also received information from Custer County, MT, about a joint wildfire mitigation project with Rosebud County. Selected tribes were: the Nez Perce Tribe, the Morongo Band of Mission Indians, the Confederated Tribes of Warm Springs, and the Northern Cheyenne Tribe. We asked open-ended questions in our interviews with state, local, and tribal officials to identify their specific challenges in accessing FEMA assistance for wildfires. We did not ask every official in every interview about each of the specific challenges discussed in this report.

<sup>9</sup>The National Emergency Management Association is the professional association for emergency management directors from all 50 states, eight U.S. territories, and the District of Columbia. The association aims to enhance public safety by improving the nation’s ability to prepare for, respond to, and recover from emergencies, disasters, and threats to national security. The National Tribal Emergency Management Council is an organization of tribal members focused on building emergency management, public health, and homeland security infrastructure and capacity within Tribal Nations.

challenges. We interviewed headquarters officials from various program offices, such as Hazard Mitigation Assistance Division, Office of Response and Recovery, Tribal Liaison Office, and Office of Environmental Planning and Historic Preservation.

We compared FEMA's efforts to address identified challenges with wildfire assistance with FEMA's *2022-2026 Strategic Plan*, the *National Disaster Recovery Framework*, and *Standards for Internal Controls in the Federal Government*, among other documents.<sup>10</sup> We determined that the information and communication component of internal controls was significant to the second objective of this work, along with the underlying principle that management should use quality information to achieve the entity's objectives. We assessed FEMA's processes for collecting and using quality information to administer relevant assistance programs to determine whether the agency could achieve the programs' objectives.

We conducted this performance audit from May 2023 to December 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>10</sup>FEMA, *2022-2026 FEMA Strategic Plan: Building the FEMA our Nation Needs and Deserves*, (Washington, D.C.: Dec. 9, 2021); DHS, *National Disaster Recovery Framework, Second Edition*, (Washington D.C.: June 2016); and GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).



# Appendix II: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

BY ELECTRONIC SUBMISSION

November 26, 2024

Christopher Currie  
Director, Homeland Security and Justice  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548-0001

Re: Management Response to Draft Report GAO-25-106862, "WILDFIRES:  
Additional Actions Needed to Address FEMA Assistance Challenges"

Dear Mr. Currie:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS, or the Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

DHS leadership is pleased to note GAO's recognition that the Federal Emergency Management Agency (FEMA) provided over \$3.8 billion in wildfire-related assistance from fiscal years (FY) 2019-2023, including about \$3.2 billion in Public Assistance grants for emergency work (such as debris removal and emergency protective measures), and permanent recovery work (such as repairing or replacing roads, utilities, and buildings). FEMA managed 13 major disasters for wildfire from FY 2019-2023, including five in California, two in Colorado, and one each in Montana, New Mexico, Oregon, Washington, Hawaii, and the Confederated Tribes of the Colville Reservation. While responding to these wildfire disasters, FEMA also responded to 727 other fire management, emergency, and major disaster declarations including spearheading the federal response to the national and unprecedented COVID-19 disaster, as well as 80 major and emergency declarations for Hurricanes, 62 major and emergency disaster declarations for tornados, and 140 major and emergency disaster declarations for flooding.

FEMA remains committed to providing assistance to communities impacted by wildfires, including search and rescue, mass care, including housing, debris and hazardous

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materials removal, and mortuary assistance, as well as providing financial assistance to fire-impacted communities through grants for mitigation. FEMA will continue to strengthen its efforts to reduce administrative burdens to communities impacted by wildfires and improve timeliness of grants and assistance.

The draft report contains 6 recommendations, five with which the Department concurs (Recommendations 1-5) and one with which the Department non-concurs (Recommendation 6). Enclosed find our detailed response to each recommendation. DHS previously submitted technical comments addressing accuracy, contextual, and other issues under a separate cover for GAO's consideration, as appropriate.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

JIM H CRUMPACKER Digitally signed by JIM H  
CRUMPACKER  
Date: 2024.11.26 08:38:30 -05'00'

JIM H. CRUMPACKER  
Director  
Departmental GAO-OIG Liaison Office

Enclosure

**Enclosure: Management Response to Recommendations  
Contained in GAO-25-106862**

GAO recommended that the FEMA Administrator:

**Recommendation 1:** Assess ways to provide assistance for immediate post-wildfire mitigation and take steps to provide such assistance. If FEMA determines it needs additional authorities, it should develop a legislative proposal for implementing the proposed change(s).

**Response:** Concur. FEMA Recovery will work in collaboration with FEMA Resilience to assess ways to provide immediate post-wildfire mitigation. Specifically, FEMA Recovery and Resilience will explore options within the agency’s authority to expedite mitigation efforts, as well as identify gaps. Following conclusion of this assessment, additional steps will be determined on how best to provide this assistance, as appropriate.

However, it is important to note that—Pursuant to Office of Management and Budget (OMB) Circular A-19,<sup>1</sup>—federal agencies are prohibited from discussing legislative proposals until cleared by OMB. Accordingly, FEMA cannot express the policy positions that could be contained in any legislative proposal until OMB clears such a proposal for transmittal to Congress.

Estimated Completion Date (ECD): December 31, 2025.

GAO recommended that the Secretary of Homeland Security:

**Recommendation 2:** Follow the process to expand, establish, or adopt a categorical exclusion for wildfire mitigation activities that includes post-wildfire soil stabilization and erosion control measures.

**Response:** Concur. FEMA’s Office of Environmental and Historical Preservation (OEHP), in collaboration with the Management Directorate’s (MGMT) Office of the Chief Readiness Support Officer (CRSO) DHS Sustainability and Environmental Programs (SEP) will request a new Categorical Exclusion (CE) to the Council on Environmental Quality (CEQ).<sup>2</sup> CE is a class of actions that a federal agency has determined, after review by CEQ, do not individually or cumulatively have a significant effect on the human environment and for which, therefore, neither an environmental assessment nor an environmental impact statement is normally required. The use of CEs

<sup>1</sup> Legislative Coordination and Clearance,” dated September 20, 1979; <https://www.whitehouse.gov/wp-content/uploads/2017/11/Circular-019.pdf>.

<sup>2</sup> The CEQ within the Executive Office of the President coordinates the federal government’s efforts to improve, preserve, and protect America’s public health and environment; <https://www.whitehouse.gov/ceq/>.

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can reduce paperwork and save time and resources. If CEQ approves, FEMA OEHP will work with MGMT OCRSO SEP to add the CE to Appendix A of the DHS Instruction Manual 023-01-001.<sup>3</sup>

ECD: December 31, 2025.

GAO recommended that the FEMA Administrator:

**Recommendation 3:** Establish a formal process to regularly collect and assess nationwide feedback from state, local, and tribal FMAG [Fire Management Assistance Grant] recipients and incorporate such feedback into program policy, as appropriate.

**Response:** Concur. FEMA’s HQ, and regional components as appropriate, already collect and assess nationwide feedback on the FMAG Program to identify opportunities for improvement to program policy, and FEMA has a plan to regularly collect feedback directly from state, local, tribal, and territorial (SLTT) FMAG recipients and subrecipients. Current efforts include but are not limited to:

- Conducting weekly working sessions with Regional FMAG points of contact (POCs) to solicit feedback on either expanding, simplifying, or clarifying guidance found in the FMAG Program and Policy Guide (FMAG PPG).<sup>4</sup>
- Holding monthly meetings with Regional FMAG POCs to discuss programmatic and implementation challenges of the FMAG program, which helps inform updates to the FMAG PPG.
- Conducting workshops—generally on a biennial basis both in-person and virtually—with Regional FMAG POCs to achieve program-wide consensus on key issues.
- Hosting calls and workshops at the FEMA Regional level, as needed, to collect feedback from FMAG recipients and subrecipients, which allows for each FEMA region to make tailored decisions in real time, when wildfires are actively burning uncontrolled, based on the needs of the stakeholders.

However, FEMA Recovery will also establish a formal process to collect and assess nationwide feedback from SLTT FMAG recipients and subrecipients through the annual Public Assistance (PA) Working Session (PAWS).<sup>5</sup> Beginning in calendar year 2025, annual PAWS agendas will include a session for FEMA to review specific FMAG Program updates with its partners and solicit feedback from FMAG recipients and subrecipients. Feedback from these sessions will be used to inform FMAG program

<sup>3</sup> DHS Instruction Manual 023-01-001, “Implementation of the National Environmental Policy Act (NEPA),” dated November 6, 2014; [https://www.dhs.gov/sites/default/files/publications/DHS\\_Instruction%20Manual%20023-01-001-01%20Rev%2001\\_508%20Admin%20Rev.pdf](https://www.dhs.gov/sites/default/files/publications/DHS_Instruction%20Manual%20023-01-001-01%20Rev%2001_508%20Admin%20Rev.pdf).

<sup>4</sup> FP-104-21-0002, “Fire Management Assistance Grant Program and Policy Guide,” dated June 2021.

<sup>5</sup> The 21<sup>st</sup> annual PAWS was held in 2024. PAWS is an annual meeting in which representatives from FEMA and SLTTs come together to discuss PA initiatives to help communities respond to and recover from emergencies and disasters.

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policy on an annual basis as necessary and during comprehensive reviews, at least once every three years. The first FMAG specific session will be held at PAWS at the National Emergency Training Center/Emergency Management Institute in Emmitsburg, MD, in April 2025. A summary of the PAWS session with FMAG recipients and subrecipients will be prepared and shared with PA Regulations and Policy and regional staff in May 2025.

ECD: May 30, 2025.

**Recommendation 4:** Document its position on approving FMAG declarations for fires burning on federal land but threatening nearby communities in the FMAG Program and Policy Guide.

**Response:** Concur. FEMA's Recovery Directorate is developing written guidance which will document FEMA's position on approving FMAG declarations for fires burning on federal land which threaten nearby state and local communities. This updated guidance will be available within the next version of the FMAG PPG, which is expected to be published by the end of November 2025. ECD: November 28, 2025.

**Recommendation 5:** Clarify eligible pre-positioning costs, including use of in-state resources, in the FMAG Program and Policy Guide.

**Response:** Concur. FEMA's Recovery Directorate is developing written guidance to clarify the eligibility of pre-positioning of in-state resources, including which costs associated with in-state prepositioned resources are eligible. This updated guidance will be available within the next version of the FMAG PPG, which is expected to be published by the end of November 2025. ECD: November 28, 2025.

**Recommendation 6:** Amend the FMAG regulations to provide Tribes the option to request FMAG declarations directly from FEMA.

**Response:** Non-concur. FEMA agrees that providing this option is desirable, however, amending regulations would first require an amendment to the Robert T. Stafford Disaster Relief and Emergency Assistance Act § 420 (Stafford Act) for tribal nations to request FMAGs directly. Until such an amendment is made to Stafford Act § 420, FEMA is unable to take action in this matter due to statutory limitations. We request GAO consider this recommendation resolved and closed.

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# Appendix III: GAO Contact and Staff Acknowledgments

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## GAO Contact

Christopher Currie, (404) 679-1875 or [curriec@gao.gov](mailto:curriec@gao.gov).

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## Staff Acknowledgments

In addition to the contact named above, Caryn Kuebler (Assistant Director), Haley Dunn (Analyst-in-Charge), Hannah Weigle, Michael del Campo, Natalie Anderson, Benjamin Crossley, Elizabeth Dretsch, Tracey King, and Kevin Reeves made key contributions to this report.

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