

September 11, 2020

The Honorable Peter Gaynor  
Administrator  
Federal Emergency Management Agency  
500 C Street SW  
Washington, DC 20472

Dear Administrator Gaynor,

On behalf of the Disaster Housing Recovery Coalition (DHRC), I urge the Federal Emergency Management Agency (FEMA) to take immediate action to protect the health and safety of people experiencing homelessness and ensure housing stability for the lowest-income survivors displaced by the wildfires in Washington, Oregon, and California. FEMA should immediately make available the greatest possible range of assistance programs, including Individual Assistance (IA), Public Assistance (PA), Transitional Shelter Assistance (TSA), and the Disaster Housing Assistance Program (DHAP), and waive current state cost-share requirements to help quickly move unsheltered individuals to safety and ensure that survivors have a stable, affordable place to call home while they get back on their feet.

The DHRC is led by the National Low Income Housing Coalition and includes over 850 national, state, and local organizations, including many organizations working directly with disaster-impacted communities and with first-hand experiencing recovering after disasters. We work to ensure that federal disaster recovery efforts reach all impacted households, including the lowest-income and most marginalized individuals who are often the hardest-hit by disasters and have the fewest resources to recover afterward, including people of color, people with disabilities, and other individuals. DHRC works to overcome [barriers](#) to and [promote solutions](#) to ensure an equitable and complete disaster housing recovery.

The wildfires pose an immediate threat to unsheltered individuals. For people experiencing homelessness, particularly those who are unsheltered, constant exposure to unhealthy air is dangerous. It is imperative that communities have needed resources and capacity to quickly move unsheltered individuals into safety, including non-congregate sheltering options such as motels, to ensure they do not suffer from smoke and ash inhalation from the wildfires. People who are homeless disproportionately suffer from underlying health conditions, including pre-existing respiratory issues, and many are sleeping in tents in the path of the wildfires. They are at acute and immediate risk of severe illness or death.

Evacuees and low-income survivors who have lost their homes in the wildfires will need access to a stable, affordable place to call home while they recover and rebuild. Without the affordable and accessible homes low-income survivors need, many survivors of past disasters have returned to uninhabitable homes, slept in cars or tents, stayed at homeless shelters, or doubled- or tripled-up with other low-income families, putting them at increased risk of eviction, homelessness, and contracting and spreading COVID-19.

FEMA should immediately approve state requests to activate all available programs and resources to assist with the response and recovery. FEMA's PA program is critical to states' efforts to protect the health and safety of unsheltered individuals during the wildfires and ongoing pandemic. PA funds are currently being used to protect homeless individuals from the spread of COVID-19 and must be made available to ensure that unsheltered individuals do not suffer from smoke inhalation from the devastating wildfires. PA funds would play an essential role in efforts to move people experiencing homelessness into safe, non-congregate shelter.

Individual Assistance (IA) could provide a lifeline for survivors to recover from the wildfires by providing financial assistance and resources to make basic structural repairs to homes. FEMA should immediately activate IA for survivors of the wildfires. Because many low-income survivors face enormous barriers in accessing this assistance, and most households receive far less than what is needed to fully recover, FEMA should implement reforms in the short and long term to ensure equal access to people experiencing homelessness, expand eligibility for households in need, overcome onerous title documentation requirements, improve inspections processes, streamline the application and appeals processes, and ensure greater transparency.

To help address the broad health and housing impacts of the wildfires on unsheltered individuals and displaced, low-income survivors, FEMA should activate its TSA program to provide short-term accommodations at hotels and motels. TSA would provide critical short-term shelter for unsheltered individuals at risk of exposure to smoke inhalation and to people evacuating from the wildfires or whose homes have been damaged or destroyed. To be eligible for the program, however, participants typically must verify that their pre-disaster residence is within the disaster area, which presents eligibility concerns when it comes to individuals experiencing homelessness. We urge FEMA to waive this burdensome requirement. Moreover, FEMA should remove barriers that make TSA inaccessible to many low-income survivors, including allowing hotels to charge daily fees or require security deposits and credit cards, arbitrary deadlines, and burdensome paperwork requirements.

FEMA should also activate the DHAP to provide longer-term direct rental assistance and case management services to people experiencing homelessness and the lowest-income disaster survivors. During past disasters, both Republican and Democratic administrations upheld DHAP as a best practice for disaster housing recovery. DHAP was created after hard-won lessons from Hurricane Katrina, and it has been used successfully in major disasters since that time. Under DHAP, displaced families receive longer-term direct rental assistance and case management services provided by local housing professionals with extensive knowledge of the local housing market. This assistance helps families find permanent housing solutions, secure employment, and connect to public benefits as they rebuild their lives. DHAP can also be used to quickly move unsheltered people out of encampments and into safe housing where they can be protected from the dangerous air from the wildfires and help transition these individuals to permanent housing rather than allowing them to return to homelessness.

Given the severity and speed with which these fires are spreading, and because many state and local budgets are depleted from COVID-19 response, we urge FEMA to waive current state cost-share requirements. FEMA is authorized to increase the federal cost-share to 100% for emergency work, including Direct Federal Assistance “if warranted by the needs of a disaster” (44 CFR§ 206.47(d)). We believe that the size and scale of the wildfires, in combination with the COVID-19 pandemic, far exceed the response capabilities of these states and warrant the full force and support of the federal government.

These resources are urgently needed to address both the immediate and longer-term health and housing needs of unsheltered individuals and the lowest-income households during the dangerous wildfires and ongoing pandemic.

Sincerely,



Diane Yentel  
President and CEO  
National Low Income Housing Coalition