Association of State Floodplain Managers (ASFPM) HMA Program & Policy Guide Discussion

In-Person

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Raleigh, NC
Shared Risk Management

“Driving Down the Risks with an Informed and Engaged Public“

Initial Risk

Outreach

Natural Storage

Structural (levees/floodwalls)

Non-Structural (acquisitions, elevations, relocations, Mit/Recon)

Contingency Plans

Building Codes

Zoning

Insurance

Residual Risk

All Stakeholders Contribute to Reducing Risk!
National Building Safety Month 2023

Week 1 Personal – Building Safety Starts at Home
Week 2 Personal – Building Safety Professionals and You
Week 3 – Local – Prepare Your Community
Week 4 – Local – Advocate for Your Community
Week 5 – Global – Solving Challenges Together

Future Desired Impacts

The Federal Insurance and Mitigation Administration (FIMA) has two overarching principles that influence all goals and objectives:

- Deliver our programs with equity
- Incorporate future conditions in all of our work
**FEMA Community Lifelines**

**Definition**
A lifeline enables the continuous operation of critical business and government functions and is essential to human health and safety or economic security.

**Purpose**
- Root Cause Analysis
- Interdependencies
- Prioritization
- Ease of Communication

**Assessing**
- Status → What?
- Impact → So What?
- Actions → Now What?
- Limiting Factors → What’s the Gap?

**Stabilization**
Occurs when basic lifeline services or capabilities are provided to survivors (may be temporary solutions)
• Building Resilient Infrastructure & Communities (BRIC)
• Flood Mitigation Assistance (FMA)
• Hazard Mitigation Grant Program (HMGP)
• Hazard Mitigation Grant Program Post Fire (HMGP Post Fire)

• Swift Current (Disaster FMA)?
• Congressional Direct Spending – Pre-Disaster Mitigation (PDM)?
• High Hazard Potential Dam (HHPD) Planning and Execution Impact?
Purpose

- Incorporate existing policies and guidance materials issued since 2015
- **Simplify and clarify guidance (623 pages)**
- Incorporate strategic mitigation priorities
- Create a document that is easier to navigate and use.
- Iterative process that focuses on continuous improvement; first step in a multi-phase process to better engage stakeholders
- Shift to a more agile update process
- Accelerated Training to Meet Local & GM needs
- Increase the accessibility of info as it relates to HMA policy and programs
Highlights of HMA Guidance

- Updates FEMA priorities such as resilience and climate adaptation, community lifelines, whole community, equity, capability and capacity building, comprehensive planning and building codes.
- Reflects changes resulting from the Disaster Recovery Reform Act of 2018.
- Incorporates additional policy changes that were published after 2015, including the Federal Flood Risk Management Standard and the Build America, Buy America Act.
- Expands information on project types based on existing job aids and factsheets, such as aquifer recharge, storage and recovery, floodplain and stream restoration, flood diversion and storage, wind retrofit, stabilization, wildfire and secondary power sources.
- Incorporates 2021 updates to Hazard Mitigation Assistance and Mitigation Planning regulations.
- Expands the eligibility of codes and standards assistance with 5% Codes and Standards.
- Incorporates regulatory changes made to Title 2 Code of Federal Regulations Part 200 in 2020 and expands information on grants management requirements and procedures.
- Expands mitigation planning content and resources.
- Includes new guiding principles, such as ones related to implementing nature-based solutions, as well as the National Mitigation Investment Strategy, National Response Framework and FEMA’s Building Codes Strategy.
- Makes non-substantive revisions to increase overall accessibility and organization of the document.

What’s missing? Incorporation of the OTHER FRAMEWORKS – Hazard Mitigation and Recovery???
FEMA Successes

- Integrated stakeholder feedback
- Improves navigation and ease of use
- Incorporates existing hazard mitigation policies and guidance materials issued since 2015
- Simplifies and clarifies guidance
- Contains strategic mitigation priorities

FEMA Update Execution

- 5,000+ comments from the BRIC stakeholder engagement process (2019)
- 400 HMA Guide internal data call comments (April 2020)
- 147 Federal Register comments for BRIC policy (comment period closed on May 11, 2020)
- Federal interagency review
- 50+ submissions to the Federal Register during the HMA Guide public comment period, resulting in over 700 individual comments (September 2022)
Changes to move forward

- Disaster Recovery Reform Act of 2018:
  - Building Resilient Infrastructure and Communities (BRIC) program
  - Hazard Mitigation Grant Program (HMGP) Post Fire program
  - Management costs
  - Earthquake early warning system eligibility
  - All other Disaster Recovery Reform Act changes impacting Hazard Mitigation Assistance
- Partial Implementation of the Federal Flood Risk Management Standard for Hazard Mitigation Assistance Programs FP-206-21-003-0001
- Build America, Buy America Act
- Additional policies and policy clarifications
- Updates to federal grants administrative regulations in Title 2 Code of Federal Regulations Part 200
- Updates to Hazard Mitigation Assistance regulations in Title 44 Code of Federal Regulations Parts 77, 80, 201, and 206

Mix in Administrative Priorities

- Executive Order (EO) 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (January 20, 2021)
- EO 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis (January 20, 2021)
- EO 14008, Tackling the Climate Crisis at Home and Abroad (January 27, 2021)
- EO 14030, Climate-Related Financial Risk (May 20, 2021)
- Innovative mitigation approaches such as climate resilient mitigation activities and nature-based solutions
- National Mitigation Investment Strategy
- FEMA Community Lifelines
- Climate Change
- Equity
- FEMA Building Codes and Standards Strategy
- Resources Issued Since 2015
- Resources for Applying and Managing Grants: Content from 65+ existing tools, fact sheets, job aids and information bulletins
Collaboration Successes

Successes

- Updated secondary power source activity section
- Expanded aquifer recharge, storage and recovery activity section
- Added building codes as overall strategic consideration
- Clarified budget and scope change procedures
- Clarified subaward closeout and liquidation timeframes
- Clarified beach and dune nourishment eligibility

Clarifications

- 12-month lock-in and de-obligation
- Information required to request an application period or period of performance extension
- Total award amount for the purpose of management costs

Expansions

- Aquifer Recharge, Storage, and Recovery
- Stabilization, Floodproofing, Tsunami Vertical Evacuation Refuge, Retrofitting, Secondary Power Source & Warning Systems
  - Includes regulatory changes made to Title 2 Code of Federal Regulations (CFR) Part 200 in 2020 and expands information on grants management requirements and procedures.
  - Incorporates changes made to HMA regulations effective Oct. 1, 2021.
  - Provides more info on codes and standards as eligible HMA activities.
  - Expands guidance content and resources on mitigation planning, recognizing its importance to effective hazard mitigation and the grants cycle process.
  - Includes new guiding principles, such as nature-based solutions, the National Mitigation Investment Strategy and the FEMA Building Codes Strategy.
  - Replaces, to the extent possible, “will” with “must” to clarify when FEMA is referring to a requirement.
Items Hoping to Find or Discussed

- Sample Ops & Maintenance Plan
- More Precalculated Benefits – Does include previous & Hospital (What about other Critical Facilities?)
- Changed Cost Estimate to “Budget” – Let’s ensure reviewers know our applications are Best ESTIMATES and not lock us in
- Good Climate Change Resource list p27, Request for Information Diagram and Floodproofing pg 421
- Good Increase & Clarification of Mitigation/Reconstruction 220k Budget Items
- Good FPM Decision-Making Process Diagram
- FEMA Explanation of Scoping Diagram & 9 Resources for Scoping applications
- Missing discussion on “Special Districts” and that Extraordinary Circumstances could have tie back to High Hazard Potential Dam program
- Good Section on Generators Pgs 501-514, Resource page should have more info

- Phase Project Discussion – but leaves out the CDS/PDM
- Better clarification on Pre-Award
- Post-Disaster Code Enforcement added, but doesn’t discuss DRRA Section 1206 pg 53
- More EHP Considerations pg 58
- Evaluation of MC by FEMA on merit? Pg 73
- URA section woefully inadequate
- Warning System – Reverse E-911 and Reverse 911 may be eligible
- In the Aquifer section – didn’t see water injection system discussed
- Management Costs and PAS could be a whole day discussion....
• Enforcement (Unfunded 3-year inspection open space, insurance for mitigated structures? Pg 109
• Clarification of 2CFR Back-up documentation M3.6 (Timesheets?)
• Award Extension Letters will have more in them pg 162
• Clarified Records Retention but really thing FEMA should have an on-line open space fill-in the blank program that goes from the local/county, state and then FEMA – we’ve had to help FEMA out on this as their record retention is less than ours (pg 181)
• Couldn’t find requirement for 30-day disaster Mitigation Strategy mentioned
• State Management Cost Request – States Enhanced AND PAS states can ask for up to 35% of the estimate – why both? Page 207
• More in-depth Project Scoping/Advance Assistance starting on Page 269
• Maybe an application plug & play document for applications – REF B3 Page 272
• Floodproofing cited one TB-7 but not others, maybe reference TB Index? ADA & Elevators needs?
Questions