December 8, 2004

The Honorable David Maurstad, Director
Mitigation Division -- Emergency Preparedness and Response Directorate
FEMA
500 C Street SW
Washington, D.C. 20472

Dear Mr. Maurstad:

The Association of State Floodplain Managers (ASFPM) is pleased to offer the following comments on the implementation by FEMA of the FY05 Pre-Disaster Mitigation Competitive (PDMC) grant program. It is our strong desire to assist the Department of Homeland Security/FEMA in making the PDMC program a success. While we commend FEMA for its leadership efforts, and fully understand the challenges of developing and implementing a nationally competitive grant program, we as an organization feel that there are areas that could be improved in order to more effectively deliver long term mitigation assistance to communities throughout the nation.

1. Application Period

Guidance for the FY05 PDMC was published by FEMA/DHS on October 29, 2004. The guidance established an application deadline of February 28, 2005. As of December 1, 2004, an application for the PDMC had not been made available to the states. The FY05 application period, just as the 90-day FY03 application period proved to be, does not provide sufficient time for the states and their local partners to coordinate and develop effective projects under the PDMC grant program.

We would recommend that the current application period be extended by 60 days. The time extension will result in increased participation by States and communities. The quality of the applications will also improve by allowing local applicants additional time to develop applications and by allowing the States additional time to offer assistance and review the applications. While we know this shortens the review period, we believe it is more important to obtain good projects up front, which in itself will reduce the time and effort needed for review and selection.

2. PDMC Training

PDMC training is being scheduled and field delivered by FEMA to the states.
The training offered includes benefit-cost analysis, environmental assessment, and e-grant training. We again commend FEMA/DHS for making this training available to the states and local governments. However, many of the states and local communities are finding it difficult to schedule training on such a short notice. We have also had reports from several states that PDMC training by FEMA/DHS is yet to be scheduled and confirmed.

We would recommend that PDMC field delivered training, offered and funded by FEMA/DHS, be made available throughout the year rather than being compressed within the same timeframe as the PDMC grant application period.

3. Application Review and Approval

The delay in grant approval and obligation was a major obstacle to the success of the FY03 PDMC program, and must be improved if the PDMC program is to continue as a viable pre-disaster funding source. FEMA must establish and adhere to application approval and funding dates.

We would recommend that State mitigation and floodplain management staffs become more involved in assisting FEMA/DHS with the review and approval process. The peer-to-peer application reviews that were conducted by State personnel during the FY03 PDMC application period were very effective. State staffs should be assigned a greater role in assisting FEMA with the review process.

We are also very supportive of any effort to clarify what projects are eligible, whether it be additional guidance, a checklist, or a combination of the two. Such clarification should increase the quality of applications submitted and make the application review period more efficient.

4. FY03 Review

As we have mentioned before, it is essential to the future success of the program that the results of each funding period be analyzed so that analysis can be used to improve the next cycle. Additionally, such an analysis could be very beneficial when provided to partners such as states and communities that may submit PDMC projects to show what types of projects are funded, what types aren’t and could even improve the quality of applications. We understand FEMA has done an analysis of the FY 03 proposals and funded projects. ASFPM requests that a copy of any analysis or data that has been generated to date be provided to us to assist us in our efforts to help you improve the PDM program.
Again, we appreciate your willingness to consider our views on this important matter, and offer these comments and recommendations in our role as a partner in our joint disaster loss reduction efforts.

Sincerely,

Chad Berginnis, CFM
Chair
Association of State Floodplain Managers