Resolution on Streamlining HMGP

Whereas, the Federal Emergency Management Agency (FEMA) has made great strides in hazard mitigation over the past five years and with a focused effort can build this nation's capability to make mitigation an integral part of our community processes and program and, we concur that the primary goals of this current effort on The Hazard Mitigation Grant Program (HMGP) are:

1. Expedite implementation of mitigation projects in communities; and
2. Ensure that selected mitigation projects are the most effective mitigation options for that particular community, and

The ASFPM feels achieving goal #1 at the expense of goal #2 would be counterproductive.

Whereas, it is important that all of us understand the current political and social environment in which mitigation is being funded and implemented. Documentation and data are needed on successful mitigation projects to demonstrate to Congress and the American public that monies spent on mitigation will reduce disaster costs. Mitigation projects must be appropriately prioritized in order to select the most effective projects and the solutions must be "sustainable," and

Therefore, be it resolved that the following suggestions to improve the current HMGP system and encourage state "partners" to assume a more active and responsible role in the HMGP program are adopted by the Association of State Floodplain Managers and recommended to FEMA:

Overview and Program

1. Develop the "Managing State" concept into an effective approach.
2. Develop a process of "documentation and assessment" of HMGP projects in order to provide the justification of the HMGP program to key decision makers.
3. Projects must be locally based (starting with a locally-developed, comprehensive community plan).
4. Mitigation projects must benefit the majority of those affected.

Funding

1. Timelines for obligating funds are important but there are many reasons and blocks (i.e., environmental assessment approval) in the process now; FEMA must identify and address those that are really blocks.
2. Much has been done to promote multi-agency coordination in actions and funding since 1993, but it must be institutionalized for a future beyond this administration. A clear set of guidelines on using
HMGP purchased land for various other federal projects or actions is another example of a need for guidance.

3. Obligating funds quickly should be done only in conformance with a pre-approved list of acceptable project "categories," not for projects outside those categories. For those meeting pre-approval criteria, the money should flow to the state immediately. The state should ensure the projects are approvable before funding them.

Project Eligibility

1. Projects must be in a community which is NFIP "compliant" – if not – no funds. This should be true whether this is a flood disaster or any disaster. The federal government should not be penalizing a community with the left hand while giving it money with the right hand. The Corps of Engineers requires a community to be NFIP "compliant" before it is eligible for a Corps Water Resources Project – FEMA should do no less with its own in-house programs.

2. Funding priorities must also be part of the FEMA/state agreement – so the mitigation projects with the most impact and long-term benefit get funded first – e.g., fund removal of floodway structures before removal of flood fringe structures. This also applies to the non-structural priority over structural, which we support for HMGP funds.

3. We need consistency among the regions on whether the removal of floodway structures requires an analysis of benefits/costs. Since their removal benefits the entire community with lower flood elevations and they are the highest risk structures, we suggest a B/C should not be required.

4. Where there are clear errors in flood mapping, flood map updates should be eligible. Without it, redevelopment will often occur at lower elevations, subject to future flooding and disaster costs. This is "nonsustainable."

5. Projects should provide long-term risk reduction and "sustainability" for the community.

6. Acquisition of commercial property due to fear that the property is not "clean" of contamination has been avoided by some Regions. This should be looked on as an opportunity to help the community meet multiple goals and be cause for acceptance, not rejection.

Planning

1. A comprehensive community plan is needed before funding and, in many cases, is not being required. Meeting the federal or state "priority" of acquisitions is not a "plan." A locally-developed, comprehensive community mitigation plan is needed in every case. That may mean HMGP must help to quickly fund some data collection and planning effort up front. That local plan, adopted by the local governing board, is what gets local commitment. We need to identify other programs that should help produce predisaster plans (Project Impact & FMA?).

2. Local plans must be based on good engineering which provides the factual basis for consideration of alternatives.

3. FEMA and the states should provide templates for the local planning process. FEMA and the states are often not viewed neutral enough to perform this facilitation. There are federal agencies that do that well, such as the National Park Service RTCA staff – that is their expertise – and private companies.
Managing State Concept

1. This project must be viewed and developed as an incentive to gain broader and increased state involvement and commitment in mitigation. Incentives can range from funding cost shares to more independence and need to be built into the program. FEMA must recognize adding more federal staff to implement and assist communities do more and better mitigation is not a reality. Building state capability must be an integral part of this program.

2. States may start with a smaller part of the HMGP, but the idea should be to get every state to full capability.

3. States should possess two main capabilities to become eligible:
   - The capability to administer a grant program; and,
   - The skills and resources at the state level to assist communities in planning and implementing mitigation programs and projects (i.e., technical assistance).

4. States should possess and be actively enforcing adequate Executive Orders to address their hazards when undertaking state funding or assistance actions.

5. There should be an agreed upon list of categories that can be funded under HMGP between the Region and states.

6. The state commitment must come from the governor, since all state agencies must commit to provide parts of the skills and resources to implement the program.

7. Neither the state nor the Region should lessen its commitment to implementing the NFIP in order to undertake this program. The NFIP, with adequate assistance and enforcement, is the most effective mitigation program in the nation. To reduce that effort, which is precariously thin already, in order to work on other mitigation programs, is counterproductive to the nation's mitigation effort.

Adopted by the ASFPM Board of Directors on May 16, 1998.