



**Testimony On**  
**Pre-Disaster Mitigation Grant Program**  
**In the**  
**Robert T. Stafford Disaster Relief and Emergency Assistance Act**

**Submitted by**  
**Association of State Floodplain Managers**

**To the**  
**Subcommittee on Economic Development, Public Buildings and Emergency Management,**  
**House Committee on Transportation and Infrastructure**

April 30, 2008

The Association of State Floodplain Managers (ASFPM) and its 26 State Chapters represent over 11,000 state and local officials as well as other professionals engaged in all aspects of floodplain management and hazard mitigation. This includes floodplain management, mapping, engineering, hydrology, flood mitigation, forecasting, water resources, planning, community development, emergency response and insurance. All ASFPM members are concerned with reducing our nation's flood-related losses. Our state and local officials are the federal government's partners in implementing flood mitigation and flood insurance programs and working to achieve our shared objectives. Our state members head offices that are designated by the state governors to coordinate the National Flood Insurance Program (NFIP) with communities.

### **Reauthorize Pre-Disaster Mitigation Grant Program**

ASFPM supports reauthorization of the PDM grant program. Because it fosters forward-looking mitigation planning and preventive actions for loss reduction, it is an important corollary to the Hazard Mitigation Grant Program, which makes mitigation assistance available after a disaster is declared.

The Pre-Disaster Mitigation (PDM) grant program is authorized in Section 203 of the Stafford Act. FEMA reports that this nationwide, multi-hazard, competitive program regularly draws applications that represent needs much greater than the available funding can address, even in years that the funding was appropriated at \$150 million or more.

The Congressionally requested report of the Multi-Hazard Mitigation Council (MMC) of the National Institute of Building Sciences released in 2006 found an overall benefit-to-cost ratio of 4 to 1 for mitigation investment. The ratio was 5 to 1 for flood mitigation projects. The Pre-Disaster Mitigation grant program leverages local mitigation funding through its cost-share. It is evident that mitigation is a wise investment and good public policy.

►► **ASFPM urges the Committee reauthorize the Pre-Disaster Mitigation Grant Program**

### **State Capacity for Technical Assistance**

FEMA has developed, and over the years refined, an evaluation process for grant applications that is rigorous and involves mitigation officials from all over the country participating in review panels. Successful applications are a product of focused work at the local level, often with state involvement, to develop projects that are consistent with local and state hazard mitigation plans and meet the many other important program eligibility requirements. Unfortunately, there is growing evidence that the rigor of the process, which we support, does not foster pre-disaster mitigation in many small states, in states without recent hazard events, and in small communities without the capacity to identify projects, evaluate options and perform the engineering and economic analyses necessary. Building increased state capacity to provide technical assistance is needed to address this situation.

To foster development and maintenance of State Mitigation Program capacity to provide technical assistance to eligible subgrantees, the current authority under the Pre-Disaster Mitigation program that provides a minimum annual allocation to states should be changed. Rather than allocate a minimum amount only for mitigation projects, states should be allowed to use some funds to support development and maintenance of the capacity to provide technical assistance on an on-going basis. State technical assistance will improve identification of mitigation opportunities in both pre-disaster and post-disaster periods, and improved mitigation plans and grant applications. It is important that this ongoing technical assistance be recognized as a legitimate pre-disaster mitigation activity; therefore, it should not be tied to specific federal grant programs or depend on the occurrence of a disaster.

►► **ASFPM urges the Committee amend the Stafford Act authority at Section 203 to allow states to elect to use the minimum amount (lesser of \$500,000 or 1% of total funds appropriated) either for mitigation projects or to build and maintain the capacity to provide technical assistance to subgrantees that are eligible under any of FEMA's mitigation grant programs.**

### **Selection of Eligible Projects**

To be eligible for PDM grants, communities must develop and adopt hazard mitigation plans. This process has an important corollary benefit of building local commitment to risk reduction. In the competitive process communities decide which feasible and cost-effective projects to submit for PDM funding through a comprehensive process to involve all sectors of the

community – so local decisions are made to address local needs. Directing a significant portion of limited PDM funds to specific projects outside of the competitive process can have the unfortunate effect of undermining local commitments.

ASFPM has been very concerned about adverse effects on overall effectiveness of the PDM program that will result from designation of 95 specific communities and projects in the FY'08 DHS appropriations in the Omnibus Appropriations bill. Some of the designated projects do not meet the PDM program criteria, and some designed communities do not have FEMA-approved hazard mitigation plans – the absence of either or both undermine a fundamental objective of hazard mitigation.

We understand that the motivation behind the designations was to ensure full and timely utilization of funds. While we share some concerns about the length of time it takes to get some types of projects approved, we believe FEMA has undertaken an extensive effort to unify its grant programs with respect to eligibility and application criteria. This will help speed up the process. It is important to recognize that some actions that contribute to what appear to be delays are the result of local budget cycles and construction season constraints, and of FEMA having to comply with the National Environmental Policy Act (NEPA).

**►► ASFPM urges the Committee to request a report by FEMA on steps taken to unify, streamline, and improve the PDM application process and the extent that awards are postponed because of compliance with NEPA and other causes. ASFPM further urges that Congress support the competitive process as authorized and refrain from specific directives that interrupt that process.**

## Summary

In closing, ASFPM believes that the PDM program is worthy of reauthorization. As a relatively new program, it has not been without growing pains. However, as the program has matured, many issues have been addressed. For example, FEMA is soliciting and utilizing stakeholder feedback to identify and anticipate issues. Also, FEMA has begun to provide feedback on projects that were determined to be ineligible and reasons why others were not funded. These and other steps are expected to improve the process.

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