Considerations for Local Mitigation Planning Grant Subapplications

This job aid provides considerations for developing a mitigation planning grant scope of work. Its ultimate goal is to encourage strong, comprehensive planning grant subapplications. It will help users understand what is needed for a hazard mitigation plan and the level of effort and cost implications of those needs.

Developing a local hazard mitigation plan can help communities reduce loss of life and property by lessening the impact of hazards. Also, a FEMA-approved hazard mitigation plan is required for communities (subapplicants) interested in receiving FEMA's grant funding for eligible mitigation projects. FEMA's Hazard Mitigation Assistance (HMA) program provides planning grants to help communities develop or update their hazard mitigation plans.

Planning grant subapplications should identify, in a clear, concise and meaningful narrative, the steps required to complete a hazard mitigation plan. This narrative will become part of the conditions of the FEMA award, so it should accurately represent a community's needs. The costs should match the identified planning tasks. In general, the cost and level of effort to develop or update a local hazard mitigation plan grow with the complexity of the planning area, planning process and data analysis needed, as shown below.

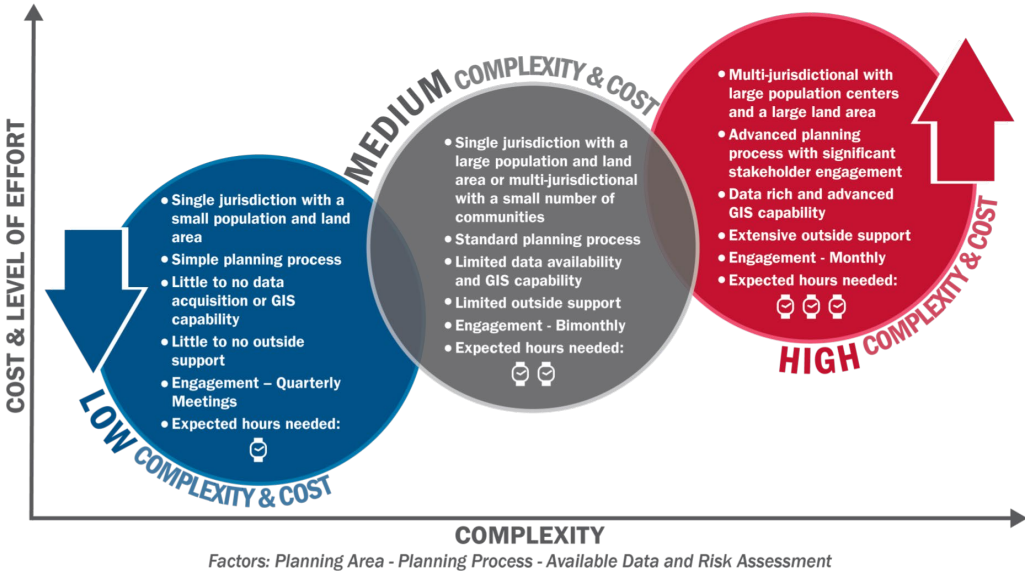

Figure 1. Complexity and Cost of Mitigation Projects

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Preparing a Strong Hazard Mitigation Assistance Local Planning Subapplication

Previous Planning Efforts

When beginning a planning grant subapplication, start by evaluating previous planning efforts, even if they were not associated with a FEMA-approved mitigation plan. The planning narrative must describe previous mitigation planning work and evaluate any past mitigation plans and mitigation efforts. Reviewing previous planning efforts can establish or update mitigation planning priorities, needs and gaps.

When developing a planning narrative, consider these key questions, along with the implications of each answer:

- Is the existing plan being updated? If so:
    - Review the previous plan's Plan Review Tool, especially the Plan Assessment section. The Plan Review Tool demonstrates how a mitigation plan meets the regulations and offers states and FEMA an opportunity to provide feedback. The Plan Assessment section lays out ways to improve the plan. The planning narrative should identify which of the Plan Assessment improvements will be included in the update. It should factor in the costs and level of effort needed to support these changes.
    - The planning narrative should indicate whether mitigation priorities have changed since the last plan. Sometimes a major disaster in a community changes what is important to update or include in a plan. Recent changes in development can also affect priorities.
- Has the community completed any activities related to mitigation planning, through FEMA or other programs?
    - If the community is participating or has recently participated in the Risk Mapping, Assessment and Planning (Risk MAP) process, the planning narrative should discuss how the community will use the Risk MAP results in the planning process. This may mean including Risk MAP participants and partners, incorporating Risk MAP data or aligning the processes. Piggybacking on the Risk MAP process may leverage the additional resources available through the mapping process. For more information, visit the Risk MAP website.
    - The community may be working to reduce its risk to natural hazards through other plans and processes. If it has identified hazards, evaluated capabilities, or developed risk reduction projects for another planning process (land use plans, master plans, open space plans, etc.), the planning narrative should document the connection between the planning grant and these other planning efforts. Aligning mitigation efforts, regardless of the program sponsoring the work, can decrease costs over time because any information that is readily available in another document may eventually be integrated into the hazard mitigation plan.

Planning Area and Planning Process

The planning area and planning process will typically drive the development of a local mitigation plan. There are usually positive relationships between the size of the planning area, the complexity of the planning process, and costs. The planning narrative must describe the geographic area the plan will cover. A summary of the planning area's demographics, while not required, can provide overall context and help assess the risk more effectively by highlighting which populations might be more or less at risk to certain kinds of hazard events. Generally, mitigation

planning areas follow the boundaries of local government jurisdictions, such as cities, townships, counties or planning districts. However, planning areas may also be defined by watersheds or other natural features. A jurisdiction's boundaries may also cross over or encompass other jurisdictions, such as a fire protection district or a utility district.

The planning narrative also explains how the community will organize and execute the planning process, including how to engage with stakeholders and the public. It explains the role of the planning team, identifies stakeholders and explains public outreach. This area of the narrative is also a good place to describe whether or not contract support will be used.

Figure 2. Local Mitigation Planning Handbook Tasks

When developing the planning narrative, consider these key questions, along with the implications of each answer:

- How many jurisdictions are participating in the planning process?
  - A larger number of participating jurisdictions will generally increase complexity and cost, because each jurisdiction must be engaged in the planning process and given the chance to provide input to the plan's content. Smaller, more compact jurisdictions may need a less intensive planning process. In the planning narrative, identify the number of jurisdictions included in the plan.
  - Meeting with or engaging each participating jurisdiction separately or in small groups will take more time and effort to execute, but it may build support for mitigation. In the planning narrative, describe the proposed methods to engage each participating jurisdiction.
  - Consider whether the local plan will include any special interest groups or tribes. If so, the level of effort may be higher because they may need special attention when identifying roles and responsibilities. Tribal governments are also subject to specific planning requirements; the planning narrative should reflect the additional work that may be needed to meet the tribal planning regulations.
- All local and tribal hazard mitigation plans must provide an opportunity for the public and stakeholders to be involved in the planning process, but the planning team gets to determine what those opportunities look like. How does the team plan to engage the public and stakeholders?
  - Consider how many meetings/workshops the team plans to hold for the planning process, including the meeting type(s) and the location(s). Generally, more meetings means a higher level of effort. In-person

meetings can be more labor-intensive than web-based ones, and travel time and costs can affect how much funding the teams need for the engagement process. Explain in the planning narrative what the team plans to do and how the planning process will benefit.

- If the team plans to conduct a public survey, the subapplication should describe the intent and value of the survey, the target audience and how the team will use the results. In the planning narrative, document the method of the survey (paper or online) and potential associated costs.
- When developing the schedule and budget, make sure to account for the time and effort to incorporate public and stakeholder feedback into the plan.

- Local jurisdictions may choose to engage an external contractor to assist with the hazard mitigation plan, but they do not have to. How does the team plan to use external contractor support?
  - Provide a detailed description of the elements of the hazard mitigation plan the contractor will be responsible for, and tie items to the budget, work schedule and scope.
  - Include an itemized budget as an attachment to the subapplication. The estimate should be reasonable, cost beneficial and correspond to the work schedule. This budget can come from the contractor, or it can be an independent estimate prepared by the local jurisdiction.

Available Data and Risk Assessment

The risk assessment is an expensive and often complex part of the planning process. The risk assessment narrative must describe the methods and resources that the planning team will use to research, collect, analyze and summarize information on hazards and associated risks. The plan must describe the natural hazards that can affect the planning area. Manmade hazards may be included in the plan, but they are not required and will not be reviewed to meet plan requirements.

Here are some key questions to consider as the team develops this planning narrative, along with the implications of each answer:

- How many hazards does the team expect to include in the hazard mitigation plan?
  - Developing hazard profiles can be time- and data-intensive. Including more natural hazards will usually increase the cost of developing the mitigation plan and add time to the schedule. Document the number of natural hazards the team expects to profile in the risk assessment, and scale the budget and schedule appropriately.
  - If the plan is receiving an update, document in the risk assessment narrative the data gaps and deficiencies the team plans to fill in the updated risk assessment. The team does not have to completely rewrite each hazard profile during the plan update. Instead, use this section to describe how to improve the risk assessment, as this will drive the costs.

- Will the team generate new data or maps for the hazard mitigation plan?

- Developing new data can be expensive and labor-intensive, but FEMA will fund that activity. If the team plans to generate new data, explain how the team will use the new data and the value it will add to the plan. Explain how the new data will build a better risk assessment and mitigation strategy. Describe where the source data will come from (including federal and non-federal sources) and how it will be processed.

- Using Geographic Information System (GIS) to map critical facilities and hazard locations can support a valuable analysis, as well as visually communicate the plan's key concepts, but it can be resource-intensive. Explain any GIS mapping and analysis needs for the plan.

- Using the state mitigation plan to support the risk assessment can reduce costs because the team may not have to acquire or analyze the data internally. If the plan will rely on state data, explain why in the risk assessment narrative.

- Will the team use a specific risk assessment methodology or software?

  - At times, a specific risk assessment methodology or software is appropriate for a plan update. The risk assessment narrative should describe the specialized methodology and its impact on the plan itself, and costs should appropriately match the tools the team intends to use.

  - If the team intends to use Hazus or other GIS software to support the vulnerability assessment, the level of customization will drive the costs. In Hazus, basic analyses using the default data will cost less than enhanced analyses that require data acquisition, formatting and analysis. The use of Hazus is not required, but it can have major implications on cost. For example, developing site-specific loss estimates can be labor-intensive but may be valuable to build the case for mitigation in an area that repeatedly floods.

  - For plan updates, it is strongly encouraged to exceed the previous planning efforts and refine the data and methods used to understand potential losses. This can mean completing a more refined Hazus analysis, sometimes called Level 2 or Level 3. If the team intends to complete a Level 2 or 3 Hazus analysis, the risk assessment narrative should explain which data the team plans to enhance and describe how this analysis will add value to the plan.

Development of the Mitigation Strategy

The mitigation strategy is the heart of a local mitigation plan, so the statement of work (SOW) should include the process the team will consider when developing the mitigation strategy. Some of the questions, like how many jurisdictions and how many hazards to include in the plan, will affect the cost and schedule for developing or updating the mitigation strategy.

Here are some additional questions to ask when developing the SOW and budget:

- Is there an existing mitigation strategy?

  - Explain in the SOW how the team intends to gather information on the status of previous mitigation actions, and determine the cost to do so. If the plan is an update, the team must provide a status report on all the previously prioritized mitigation actions. Further, the plan will include an evaluation and prioritization of new

mitigation actions identified since the previous plan was approved. This information can take time to track down, especially if new staff are in place.

- How complex is the local planning framework?
  - The mitigation strategy includes an assessment of mitigation capabilities. A complex local planning framework with many programs, ordinances and/or policies related to mitigation may increase the level of effort needed to adequately document the information. If this is the case, document what is needed to capture the information accurately and efficiently. Ensure the budget matches the needs.
  - If any of the team's communities participate in the National Flood Insurance Program (NFIP) and/or Community Rating System (CRS), the SOW should account for the level of effort needed to capture information related to NFIP and CRS compliance. CRS communities can get additional points for having an adopted hazard mitigation plan; points can be maximized by undertaking the additional tasks prescribed for each mitigation planning phase. More details can be found in the CRS Coordinator's Manual and 2021 Addendum, the Mitigation Planning and the CRS Key Topics Bulletin and in the Local Mitigation Planning Handbook (specifically, see Appendix A, Worksheet 1.1).

Plan Adoption

A planning grant subapplication must result in a FEMA-approved mitigation plan. As such, the plan adoption narrative must describe the plan drafting process, including state and FEMA reviews, adoption by participating jurisdictions and final approval by FEMA. Plan adoption does not usually have a significant impact on the plan adoption narrative or cost.

It can, however, affect the schedule in a few significant ways:

- How soon will the plan expire?
  - If applying for a grant to complete a plan update, it is important to keep the local plan expiration date in mind. FEMA does not approve updates of local plans that have expired. The team may need to compress the plan drafting and the adoption/approval schedule; this does not necessarily increase costs, but it can increase how many resources are needed in a short time period. Document this in the planning work schedule. It is important to understand the subapplication approval process so there is enough time before the plan expires.
  - The work schedule should account for any changes that might occur during the review and adoption by the local governing body. If the plan is changed during this process, it must be resubmitted for state and FEMA review.
- How will the plan be adopted?
  - Jurisdictions have their own policies and procedures for adopting the local mitigation plan. Document in the planning work schedule if/how the method of adoption will affect the schedule. The frequency with which the

adopting body meets can affect how long it may take for the plan to be adopted and for the adoption resolution to be sent to the state and FEMA for final approval.

Considerations for Budgets

Budgets should be documented in the planning SOW and supported by documentation. Budgets must include detailed estimates of various cost item categories, such as labor, materials, equipment and subcontractor costs. Lump-sum estimates are not accepted. The team should provide a record of all documents used to develop the estimate and a narrative that describes how costs were derived for each item in the estimate. The reviewer should be able to point to any item on the budget and understand how that cost relates to the scope and how the estimate was derived.

Consider the following when developing the planning grant subapplicant budget:

- What are the main items to consider when developing a budget?
  - Preparing a budget is a key function for developing a successful plan. A good budget will help manage the entire planning process. Make sure to have adequate resources to complete and adopt the mitigation plan. Many times, budgets are based on the phases of the planning process.
  - The budget should account for the entire performance period for producing the plan and include sufficient time for state and FEMA review, potential revisions and local plan adoption. The period of performance cannot exceed three years, including grants management activities required for closing out the subaward.
  - The budget can include costs for the planning team to travel to and attend applicable training, such as G-318: Local Mitigation Planning Workshop or Planning for a Resilient Community Training.
  - It is recommended that the planning team convene to develop the planning grant application together. This is an eligible pre-award cost that can be included in the budget.
  - As part of the planning process, the local governing body must submit the draft plan for public comment and approval. In the budget, include the cost for producing and distributing publications associated with the plan. Also account for public outreach and stakeholder coordination efforts in the budget. Outreach methods vary in cost according to the amount and level of effort by the subapplicants.
  - The budget should account for any special studies or additional funds needed to support any enhanced analysis included in the plan. It should also account for any newly identified hazards that will be considered in a plan update.
  - Identify all in-kind staff time, including costs incurred to support plan coordination and outreach. In-kind costs can be applied to meet the non-federal grant match, which is up to 25% of the total cost of the plan.
  - Management costs represent the indirect and administrative expenses anticipated during plan development. The amounts, allowable uses, and procedures for requesting management cost funding vary by program and are found in the HMA Guidance (2015).

- If planning to hire a contractor, what cost items should be considered in the budget?
    - Supportive documentation, such as contractor estimates, should demonstrate a clear understanding of the SOW, limitations and final outcomes of the plan. If the estimate is based on carefully thought-out assumptions, it will factor in many of the changes that come after the grant is awarded.

The documentation should communicate the estimator's knowledge of the planning tasks by demonstrating an understanding of scope and schedule as they relate to cost. It should establish a realistic baseline for the scope and cost, which will lessen the chance of cost overruns. Cost fluctuations happen, but if the estimate is based on carefully thought-out assumptions, it will account for the changes that may arise as the planning process evolves.

Mitigation Plan Requirement to Receive HMA Mitigation Project Funding

As stated on the first page of this job aid, subapplicants interested in receiving HMA funding for mitigation projects are required to have a FEMA-approved mitigation plan. Information on the mitigation plan requirement is found on FEMA's Mitigation Planning and Grants website. However, under limited circumstances, applicants (states), on behalf of a subapplicant, may request an exception to the mitigation plan requirement to receive a mitigation project grant. As a condition of the award, the subrecipient must have a FEMA-approved mitigation plan within 12 months of the mitigation project subaward. Details about this option are found in the HMA Guidance.

Resources and Additional Information

- Regulations and Guidance: Hazard mitigation planning laws, regulations and policies guide the development of state, local, tribal and territorial FEMA-approved hazard mitigation plans, as well as various grant programs.
- HMA: HMA provides information on grant policy and resources that can assist with the development of planning grant applications. See the Resources for Applying tab. HMA program guidance is available online.
- Hazard Mitigation Planning: Additional details about hazard mitigation planning are available from the Hazard Mitigation Planning website. More information on local planning requirements, approaches and examples is available in the Local Mitigation Plan Review Guide and Local Mitigation Planning Handbook.
- NFIP: Visit the NFIP website to view a variety of resources related to flood insurance, flood mapping and flood mitigation. More information on the requirements related to CRS is available from the National Flood Insurance Program Community Rating System website.