

PART 2 – ENHANCED STATE MITIGATION PLANS

The Enhanced State Mitigation Plan designation recognizes the State as a proactive leader in implementing a comprehensive statewide hazard mitigation program. The enhanced status acknowledges the extra effort a State has made to reduce losses, protect its resources, and create safer communities. For mitigation plans to receive this designation, the State must obtain a "Satisfactory" score on all of the Standard State Plan requirements as described in Part 1 of this manual. In addition, it must receive a "Satisfactory" score on each of the Enhanced State requirements.

The sections covered in Part 2 – Enhanced State Mitigation Plans include:

- Prerequisite
- Comprehensive State Hazard Mitigation Planning Program

PREREQUISITE

The State submitting a mitigation plan for designation as an Enhanced State Mitigation Plan **must** meet the following prerequisite before FEMA can approve the plan.

COMPLIANCE WITH STANDARD STATE PLAN REQUIREMENTS

Requirement §201.5(b): Enhanced State Mitigation Plans must include all elements of the Standard State Mitigation Plan identified in §201.4

Explanation: In order to be considered for Enhanced Plan status, the plan **must** contain all the elements of the Standard Plan (per §201.4), in addition to meeting all the requirements listed in §201.5. All the elements required for the Standard Plan must receive a score of “Satisfactory” before the plan is reviewed for compliance with the Enhanced State requirements.

Resource: For more information on preparing and implementing a mitigation plan, see:

- ✓ *Developing the Mitigation Plan* (FEMA 386-3), Step 3.
- ✓ *Bringing the Plan to Life* (FEMA 386-4), Step 2.

Scoring:

- Not Met. Not all of the Standard State Plan elements have received a “Satisfactory” rating.
- Met. All elements of the Standard State Plan contained in the Enhanced Plan received a “Satisfactory” rating.

COMPREHENSIVE STATE HAZARD MITIGATION PLANNING PROGRAM

§201.5 addresses Enhanced State Mitigation Plans. This is FEMA's effort to recognize those States that go above and beyond the minimum mitigation requirements by making them eligible to receive an increased amount of mitigation grant funding. Strong State and local mitigation planning processes and comprehensive mitigation program management at the State level are important elements in reducing vulnerability to future disaster losses. It is hoped that the Enhanced Plan option will encourage more States to take their planning to a higher level. For the Enhanced State Plan, States must meet all of the requirements of the Standard Plan, plus be able to demonstrate that the State already has a comprehensive mitigation program, that they effectively use available mitigation funding, and that they are capable of managing the increased funding.

This section includes the following six subsections:

- Integration with Other Planning Initiatives
- Project Implementation Capability
- Program Management Capability
- Assessment of Mitigation Actions
- Effective Use of Available Mitigation Funding
- Commitment to a Comprehensive Mitigation Program

INTEGRATION WITH OTHER PLANNING INITIATIVES

**Requirement
§201.5(b)(1):**

[An Enhanced Plan must demonstrate] that the plan is integrated to the extent practicable with other State and/or regional planning initiatives (comprehensive, growth management, economic development, capital improvement, land development, and/or emergency management plans) and FEMA mitigation programs and initiatives that provide guidance to State and regional agencies.

Explanation:

This requirement is similar to §201.4(b) for the Standard Plan, which is discussed previously in *Program Integration* (page 1–11), except that it requires the State to detail how the Enhanced Plan is specifically integrated into other State, regional, and FEMA initiatives that provide primary guidance for hazard mitigation-related activities.

States might demonstrate that they have integrated the plan with planning initiatives that provide guidance by such activities as coordinating with developers of State plans (e.g., statewide economic development, capital improvement, or public works plans) to incorporate hazard mitigation priorities; passing State laws or regulations that mandate integration of mitigation considerations with other planning initiatives at the State level; and/or working with Regional Planning Authorities or Councils of Government.

When applying this requirement, reviewers should keep in mind the differences in planning conditions among States. For example, in States with extensive planning resources, integration with other plans may be more comprehensive. However, States with limited resources and little tradition of collaboration across agencies should receive credit for demonstrating measurable progress towards integration of efforts.

Resource:

For more information on integrating hazard mitigation activities in other initiatives, see:

- ✓ *Getting Started* (FEMA 386-1), Step 1.
- ✓ *Bringing the Plan to Life* (FEMA 386-4), Step 2.

Examples:



Original Submittal:

Integration with Other Planning Initiatives

In furthering the concept and practice of hazard mitigation across the State, the Hazard Mitigation Committee (HMC) created a subcommittee to explore the feasibility of integrating State hazard mitigation planning with other statewide planning initiatives such as the State Smart Growth initiative and the State economic development plan.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.5(b)(1)		<ul style="list-style-type: none"> ▪ While it is encouraging that the HMC created a subcommittee to explore integration with other planning initiatives, a strategy to promote integration has not yet been developed.

Required Revisions:

The submittal must explain the steps that the planning committee has taken or intends to take to integrate hazard mitigation.



Revised Submittal:

Integration with Other Planning Initiatives

In furthering the concept and practice of hazard mitigation across the State, the Hazard Mitigation Committee (HMC) created a subcommittee to explore the feasibility of integrating State hazard mitigation planning with other statewide planning initiatives such as the State Smart Growth initiative and the State economic development plan. **The subcommittee developed the following strategy to further this work:**

- **The State Hazard Mitigation Officer met with the Director and Assistant Director of the State Economic Development Agency to discuss integration of hazard mitigation concepts into economic development initiatives. The meeting produced a commitment from the Director to invite HMC representatives to participate in upcoming strategic planning sessions. The strategic plan is to be completed before the next budget cycle.**
- **The Governor's Authorized Representative, who co-chairs the HMC, has agreed to have the Governor's office develop an executive order directing State agencies to work with the HMC to integrate hazard mitigation concepts into State operations where feasible.**
- **The HMC is developing a presentation and training program to educate State workers about the need for hazard mitigation and the ways that mitigation can be integrated into everyday operations.**
- **The State Smart Growth Office, a strong supporter of hazard mitigation, and with representation on the HMC, has developed a new position, Hazard Reduction Policy Coordinator. The**

Coordinator is the first paid hazard mitigation employee hired by the State who is outside the State Office of Emergency Preparedness.

These new initiatives will create a comprehensive approach to reducing losses in the State. The State's CRS and FMA programs have been in place since these programs were created. Additionally, the State received PDM funding for all planning and project grant applications it submitted in fiscal year 2004.

PROJECT IMPLEMENTATION CAPABILITY

<p>Requirement §201.5(b)(2)(i) and (ii):</p>	<p>[The Enhanced Plan must document] the State's project implementation capability, identifying and demonstrating the ability to implement the plan, including:</p> <ul style="list-style-type: none"> ▪ Established eligibility criteria for multi-hazard mitigation measures. ▪ A system to determine the cost effectiveness of mitigation measures, consistent with OMB Circular A-94, Guidelines and Discount Rates for Benefit-Cost Analysis of Federal Programs, and to rank the measures according to the State's eligibility criteria.
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Explanation:

These requirements build on §201.4(c)(3)(ii), which is discussed in the sections on State and local capability assessment on pages 1-37 through 1-42. However, while §201.4(c)(3)(ii) requires that the State demonstrate its capabilities to implement policies and programs to mitigate hazards, §201.5(b)(2)(i) requires that States identify their eligibility criteria for mitigation actions.

Development of such criteria was formerly undertaken during the *HMGP application process*. However, DMA 2000 now requires each State to consider these criteria as part of its *planning process* (See §206.435 of the Rule). States with HMGP experience might list existing criteria or use the planning effort as an opportunity to revisit and update these criteria. These eligibility criteria should be integral to developing a State's mitigation strategy where, ideally, mitigation actions would be categorized by short, medium, and long-term timeframes and then further prioritized as high, medium, or low.

Per §201.5(b)(2)(ii), States **must** also describe their approach to evaluating the cost-effectiveness of identified actions and explain or demonstrate how this approach is consistent with OMB Circular A-94. The description should include the agency and staff responsible for conducting benefit-cost analyses, reviews, or any other assessment method used. The selected actions **must** then be ranked according to the eligibility criteria.

Resource:

For information on prioritizing actions and determining eligibility, and for a discussion about methods to determine cost effectiveness, see respectively:

- ✓ *Developing the Mitigation Plan (FEMA 386-3), Step 2.*
- ✓ *Mitigation Benefit Cost Analysis (BCA) Toolkit Compact Disc (CD).*

Examples:



Original Submittal:

During the formation of its Mitigation Strategy, the State developed eligibility criteria for determining how hazard mitigation projects will be addressed. These criteria were initially developed for the HMGP application and have been revised.

Each County within the State provided a prioritized list of mitigation projects for their municipalities. These projects included such things as buyouts for repetitive flood loss properties, the building of tornado shelters, the application of certain communities to the CRS program, and the development of new routes for the transportation of hazardous materials. The State then categorized these projects by their priority to the County, their cost, and the timeframe for implementation.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.5(b)(2)(i) and (ii)		<ul style="list-style-type: none"> ▪ The plan does not list the eligibility criteria, the method used to determine cost effectiveness, or the system for ranking actions.

Required Revisions:

The plan must list its eligibility criteria and address how cost-benefit analysis, review, or other methods were used to determine cost effectiveness of actions. It must also describe the system for ranking eligible actions.



Revised Submittal:

During the formation of its Mitigation Strategy, the State developed eligibility criteria for determining how hazard mitigation projects will be addressed. ~~These criteria were initially developed for the HMGP application and have been revised.~~ **This was done through the State Hazard Mitigation Planning Committee in regular meetings with the Counties. The eligibility criteria requires projects to:**

- **Be cost effective.**
- **Address repetitive loss properties.**
- **Be located in the most vulnerable areas identified in the State Hazard Mitigation Plan.**

- **Have local matching funds (including in-kind contributions).**

~~Each County within the State provided a prioritized list of mitigation projects for their municipalities. These projects included such things as buyouts for repetitive flood loss properties, the building of tornado shelters, the application of certain communities to the CRS program, and the development of new routes for the transportation of hazardous materials. The State then categorized these projects by their priority to the County, their cost, and the time frame for implementation.~~

The State helped the Counties apply a cost-benefit analysis to their proposed mitigation projects. The Counties used this analysis to prioritize their projects. Projects were prioritized by such items as frequency of the disaster being mitigated, financial impact to the community, human losses, and timeframe for completion. For example, flooding is the biggest concern in certain areas of the State, whereas in the “flats” tornadoes are the major concern. Each County has a different prioritization for hazard mitigation projects within its jurisdiction (see Appendix XX for a list of criteria provided by County).

The State is then responsible for prioritizing each of the County’s projects with respect to how much and when State help will be available. The State takes the number one priority for each County and then ranks these projects by giving a certain number of points to as follows:

- **Cost effectiveness (i.e., those projects that demonstrate that they are the most cost effective) (20 to 35 points).**
- **Listing on the Repetitive Loss Property List (40 points).**
- **Location within the most vulnerable areas in the State (10 to 25 points).**

In addition to funding, the State provides support to the Counties in several ways, including actual project implementation, seeking additional funding, project support, public involvement activities, and the provision of additional information (see Appendix XX for a list of ranked projects).

The State Hazard Mitigation Committee (HMC) tracks when and how projects are being implemented, as well as how their funding is being used (see Section XX of the plan for more details). If there is a problem or conflict with a project, the State acts as a mediator to resolve the problem as quickly and efficiently as possible. The State also conducts “lessons learned” meetings with Counties as necessary. As projects are completed, the State makes note of this in each County’s file and maintains records on every project.

PROGRAM MANAGEMENT CAPABILITY

<p>Requirement §201.5(b)(2)(iii A-D):</p>	<p>[The Enhanced Plan must demonstrate] that the State has the capability to effectively manage the HMGP as well as other mitigation grant programs, [and provide] a record of the following:</p> <ul style="list-style-type: none"> ▪ Meeting HMGP and other mitigation grant application timeframes and submitting complete, technically feasible, and eligible project applications with appropriate supporting documentation; ▪ Preparing and submitting accurate environmental reviews and benefit-cost analyses; ▪ Submitting complete and accurate quarterly progress and financial reports on time; and ▪ Completing HMGP and other mitigation grant projects within established performance periods, including financial reconciliation.
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Explanation: Because approval of an Enhanced Plan results in increased mitigation grant funding, this section requires States to demonstrate their capabilities to effectively manage the HMGP and other mitigation grant funds they have previously received. FEMA Regional Offices will certify that the State has the capacity to effectively manage the HMGP, FMA, and PDM programs. The State is not required to document this in their plan.

ASSESSMENT OF MITIGATION ACTIONS

Requirement §201.5(b)(2)(iv):	[The Enhanced Plan must document the] system and strategy by which the State will conduct an assessment of the completed mitigation actions and include a record of the effectiveness (actual cost avoidance) of each mitigation action.
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Explanation: §201.5(b)(2)(iv) builds on §201.4(c)(5)(ii) and (iii), which were discussed previously in *Monitoring Progress of Mitigation Activities* (page 1-59). States **must** describe how they would assess the effectiveness of each completed mitigation action, what agency or agencies will be involved in the assessment, and indicate the timeframe for carrying out this assessment. The results of this assessment will be necessary during the next plan update to verify achievement of the plan’s goals and objectives, and to fine-tune or revise the mitigation strategy.

The State **must** describe how it will track potential losses avoided for each action taken (e.g., by developing a database or GIS system) since, in many cases, losses avoided cannot be accurately determined until a disaster occurs and damages are assessed.

Resource: For information on how to evaluate the effectiveness of mitigation actions see:

- ✓ *Bringing the Plan to Life* (FEMA 386-4), Step 3.

Examples:



Original Submittal:

The State has established a method to determine the effectiveness of mitigation actions being undertaken in the State. During the preparation of the State Hazard Mitigation Plan, the State partnered with the State University to develop several economic analysis models to determine the economic feasibility of various past mitigation actions. One of these models considered reductions in physical damages and financial losses that helped determine the effectiveness of mitigation actions by showing the resulting reduction in damages and losses. Other models showed various cost-benefit analyses to help communities decide which mitigation activities to implement.

Several of the State’s communities currently have hazard mitigation plans in place. The economic models can be applied to those existing plans as well as help communities who are in the process of developing hazard mitigation plans. The State will provide help to the local communities in running and analyzing the economic models.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.5(b)(2)(iv)		<ul style="list-style-type: none"> ▪ The State is active in trying to assess the effectiveness of its mitigation actions; however, no specifics are given. ▪ It is not clear what agency or agencies will be responsible for developing and implementing the economic modeling analyses or how the local communities will benefit.

Required Revisions:

The plan must provide specific information about how the effectiveness of mitigation actions will be assessed. Specific agency or agencies must be mentioned and a timeframe for conducting these assessments must be developed.



Revised Submittal:

~~The State has established a method to determine the effectiveness of mitigation actions being undertaken in the State. During the preparation of the State Hazard Mitigation Plan, the State partnered with the State University to develop several economic analysis models to determine the economic feasibility of various past mitigation actions. One of these models considered reductions in physical damages and financial losses that helped determine the effectiveness of mitigation actions by showing the resulting reduction in damages and losses. Other models showed various cost benefit analyses to help communities decide which mitigation activities to implement.~~

As part of the State Hazard Mitigation Plan, the State Office of Economic Development partnered with the State University to develop several economic models to assess the losses avoided by various mitigation actions. These models used hazard data from recent events to determine the likely damages to structures *had mitigation actions not taken place*. The models then used the probability of the event to calculate the avoided damages based on the net present value of the benefits.

~~Several of the State's communities currently have hazard mitigation plans in place. The economic models can be applied to those existing plans as well as help communities who are in the process of developing hazard mitigation plans. The State will provide help to the local communities in running and analyzing the economic models.~~

The Office of Economic Development is working with local communities to help them apply these analyses. A majority of the State's communities already have implemented some mitigation actions, and these models can be applied to quantify the benefits of mitigation activities identified in previous mitigation plans. The State Office of Planning is working with the remainder of the communities to develop hazard mitigation plans, whereupon economic feasibility analyses can be applied to specific mitigation strategies.

Following hazard events in the areas receiving mitigation action, communities will be required to show what damages and losses have been avoided (e.g., structural damages prevented, business inventory damages prevented, rental income losses avoided, personal property losses prevented) by implementing their mitigation strategies. The communities are allowed discretion in determining how they will track losses avoided (e.g., utilizing GIS or database technology).

The Office will review these analyses and provide feedback to the communities. The Office of Economic Development will conduct yearly checks on the communities to ensure that they are using these analyses effectively. It is recognized that non-economic factors are a major consideration and are difficult to incorporate into economic modeling.

EFFECTIVE USE OF AVAILABLE MITIGATION FUNDING

Requirement §201.5(b)(3): [The Enhanced Plan must demonstrate] that the State effectively uses existing mitigation programs to achieve its mitigation goals.

Explanation: In order for FEMA to increase the amount of HMGP funding available to a State in subsequent disasters, it is important that the State document that it has fully and effectively made use of FEMA and other funding already at its disposal. §201.5(b)(3) requires States to demonstrate how they have taken advantage of FEMA programs, such as the Flood Mitigation Assistance Program (FMA), the Hazard Mitigation Grant Program (HMGP), and the Pre-Disaster Mitigation Program (PDM) to fund mitigation actions. If States have used other FEMA and non-FEMA funding to support mitigation, they *should* include this documentation as well.

In addition to describing projects that have been implemented, the plan *should* link the projects to specific State goals and objectives and assess the effectiveness of the projects in achieving the goals.

The plan *should* also describe the State’s strategy for ensuring continued effective use of resources (e.g., forming partnerships to leverage funding).

Resource: For information on how to evaluate the effectiveness of mitigation actions in achieving the plan’s goals, see:

- ✓ *Bringing the Plan to Life* (FEMA 386-4), Step 3.

Examples:



Original Submittal:

The State uses a variety of funds and programs to achieve its mitigation goals, including the Flood Mitigation Assistance Program (FMA), the Hazard Mitigation Grant Program (HMGP), and the State Hazard Mitigation Assistance Initiative (HMAI).

REVIEWER’S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER’S COMMENTS
§201.5(b)(3)		<ul style="list-style-type: none"> ▪ The plan needs to explain <i>how</i> the State has taken advantage of all of the hazard mitigation opportunities currently available to them.

Required Revisions:

The revised plan must explain how the State uses Federal and State hazard mitigation funds and programs to achieve its goals, including the possible combination of two or more funding programs.



Revised Submittal:

The State uses a variety of funds and programs to achieve its mitigation goals, including the Flood Mitigation Assistance Program (FMA), the Hazard Mitigation Grant Program (HMGP), and the State Hazard Mitigation Assistance Initiative (HMAI). **These are described below:**

Flood Mitigation Assistance Program (FMA): The State has facilitated the use of FMA funds by local governments for the development of local hazard mitigation plans and projects. The State Hazard Mitigation Grant Coordinator visits each County yearly to develop local project applications and provides project management oversight for the grant. The State's goal is to have one-quarter of its communities using FMA project, planning, or technical assistance funds each year to help fund planning initiatives, projects, or flood hazard studies.

Hazard Mitigation Grant Program (HMGP): The State has facilitated the use of HMGP funds for post-disaster hazard mitigation projects. Because HMGP funds are post-disaster funds and their availability from year to year is uncertain and limited, the State only allows funding for local projects that are captured in existing local hazard mitigation strategies. Also, the State uses its 5% HMGP set-aside to help fund State technical assistance to local governments.

State Hazard Mitigation Assistance Initiative (HMAI): The State can provide up to 12.5% matching funds through the HMAI to help fund local hazard mitigation projects implemented through HMGP or FMA. These funds are provided to localities based first on need (i.e., there are few local resources to meet the 25% match requirement for Federal grants), and then on a competitive basis that compares benefit-cost analyses, environmental compatibility and justice, and political viability across jurisdictions.

COMMITMENT TO A COMPREHENSIVE MITIGATION PROGRAM

<p>Requirement §201.5(b)(4)(i-vi):</p>	<p>[The Enhanced Plan must demonstrate] that the State is committed to a comprehensive state mitigation program, which might include any of the following:</p> <ul style="list-style-type: none"> ▪ A commitment to support local mitigation planning by providing workshops and training, State planning grants, or coordinated capability development of local officials, including Emergency Management and Floodplain Management certifications. ▪ A Statewide program of hazard mitigation through the development of legislative initiatives, mitigation councils, formation of public/private partnerships, and /or other executive actions that promote hazard mitigation. ▪ The State provides a portion of the non-Federal match for HMGP and/or other mitigation projects. ▪ To the extent allowed by State Law, the State requires or encourages local governments to use a current version of a nationally applicable model building code or standard that addresses natural hazards as a basis for design and construction of State sponsored mitigation projects. ▪ A comprehensive, multi-year plan to mitigate the risks posed to the existing buildings that have been identified as necessary for post-disaster response and recovery operations. ▪ A comprehensive description of how the State integrates mitigation into its post-disaster recovery operations.
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Explanation:

The intent of this requirement is to allow States to describe mitigation-related activities that do not necessarily have a basis in a program or regulation. These activities truly show State commitment to reducing losses from hazards. States may demonstrate this commitment by describing how they have successfully implemented programs or projects that have reduced their exposure to hazards and how they will build on these past successes. Each State's mitigation strategy may include, but is not limited to, any of those elements mentioned above. Other actions that go "above and beyond" the requirements of the Standard Plan will be considered. If a State has no previous experience with mitigation initiatives, then the plan may only contain the various elements that the State proposes to implement. In either case, States *should* provide a timeframe for implementing these initiatives.

If the documentation to satisfy this plan requirement is not included in its own section of the plan, the plan review crosswalk accompanying the plan *should* identify where in the plan these various commitments are described.

Special Considerations:

Although the Rule requirements do not specifically mention the development of a statewide risk assessment as a means to facilitate better coordination and detail in local mitigation planning, carrying out such an activity is a good way to meet this particular requirement.

Resource:

For information on implementing a hazard mitigation program, see:

- ✓ *Bringing the Plan to Life* (FEMA 386-4), Step 2.

For ideas and examples of mitigation programs, policies, and projects, see:

- ✓ *Developing the Mitigation Plan* (FEMA 386-3), Steps 1 and 2.

Examples:



Original Submittal:

The State has developed a program by which it provides hazard mitigation training workshops for local governments. The State advertises the availability of the program through a brochure mailing that details the procedures for requesting the workshop.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.5(b)(4) (i-vi)		<ul style="list-style-type: none"> ▪ The description of providing assistance is very brief; it does not include such details as the duration of the workshops, the staff or agencies providing training, or sources of funding.

Required Revisions:

The plan must document in detail the process by which the State implements its hazard mitigation programs and initiatives. If the program has been in place for some time, the plan should provide details about the results or performance of the program.



Revised Submittal:

The State has developed a program by which it provides hazard mitigation training workshops for local governments. The State advertises the availability of the program through a brochure mailing that details the procedures for requesting the workshop. **After a local government requests the training workshop, the State coordinates the logistical details with the local government for holding the workshop.**

The following State HMC representatives have been trained and authorized to conduct training for local governments on hazard mitigation planning:

- **The State Hazard Mitigation Officer, State Office of Emergency Preparedness**
- **The Hazard Reduction Policy Coordinator, State Smart Growth Office**
- **The Environmental Stewardship Officer, State Division of Environmental Protection**

Funding for the two-day workshop is provided through the State Hazard Mitigation Assistance Initiative (HMAI) and local funds. Each County government receives up to \$1,500 to arrange the location, audio/visual equipment, invitations to interested staff and other local interested parties, and food. Any shortfall is made up through local funds. Since the training workshop program's initiation in 1999, five workshops have been conducted, and each of these localities has submitted a compliant hazard mitigation plan within one year of the workshop, as required.