

**NORTH CAROLINA ASSOCIATION OF FLOODPLAIN MANAGERS
ANNUAL CONFERENCE – ATLANTIC BEACH, NC
September 10, 2002**

**PROPOSED FY 2003 COMPETITIVE PRE-DISASTER
MITIGATION PROGRAM**

FEMA PROPOSAL

The President's Fiscal Year (FY) 2003 budget proposal includes \$300 million under the National Pre-Disaster Mitigation Fund to initiate a competitive grant program for pre-disaster mitigation. Consistent with funding available under the FY 2002 Pre-Disaster Mitigation grant program, eligible activities under a competitive grant program would include: risk assessments; State and local mitigation planning; the reinforcement of structures against seismic, wind, and other hazards; elevation, acquisition, or relocation of flood-prone structures; and minor flood control or drainage management projects.

The annual grant program would provide a consistent source of funding that would allow States and communities to develop more comprehensive proposals and projects to reduce their overall risks. Communities would no longer be dependent on a disaster declaration in order to obtain a FEMA mitigation grant.

The competitive grant program would replace the formula-based Hazard Mitigation Grant Program for FY 2003.

NCAAFPM CONCERNS

Establish A Pre-Disaster Grant Program But Not At The Expense Of The HMGP

NCAAFPM is very concerned about the proposed termination of the formula based HMGP program for post disaster mitigation. Important, but sometimes difficult, mitigation actions are facilitated by the heightened public awareness of risk in a post disaster situation. Despite our firm commitment to promoting pre-disaster mitigation, we also know very well the importance of taking steps to mitigate future disasters while recovering from a disaster.

Don't Throw Out the HMGP – Fix It

The NCAAFPM appreciates the concern regarding the apparent slow pace of distributing funds under the Hazard Mitigation Grant Program. However, it is important to understand that most projects funded by this program, such as floodplain buyouts, do not happen rapidly. Before applications can be submitted, communities must carefully plan their efforts, involve citizens and nurture participation by property owners. This takes time to do properly, and is crucial for local acceptance.

Additionally, after the grant has been awarded, communities have a tremendous amount of work, especially when a project involves low-income families that need assistance finding comparable housing. The Association urges FEMA and the Congress to understand that acquisition projects, which may involve one or several hundred properties, can take years to complete.

The NCAFPM is greatly concerned about the criticism that a large percent of HMGP projects do not appear to be cost effective and that this may have led to the proposal to institute a nationwide, competitive grant program. If projects have been funded which are not cost effective, it is because current HMGP rules were not followed by FEMA and the states. This is no justification for ending the HMGP and replacing it with a competitive grant program. We have seen nothing in the proposed new program that would correct this problem. If the system is not working, fix it. Don't carry the same problems to a new program.

Sole Reliance On A Pre-Disaster Competitive Grant Program Will Limit Local Government Eligibility For Mitigation Grants

Shifting to a program that is entirely competitive in nature may, indeed, result in only the most cost-beneficial projects receiving funding. However, a single-minded focus on the most cost-beneficial projects will severely penalize communities that have good projects ready to go, and which are cost effective for the nation by reducing taxpayer costs. In the face of competition with large communities, smaller communities and smaller projects may go unfunded, leaving property and lives at risk.

Focusing on the most cost-beneficial projects can have other detrimental effects on hazard mitigation initiatives. Such a focus could emphasize funding for projects in communities that may be doing the least to avoid flood losses. While these communities surely need help, the program should also reward local governments taking steps to reduce the drain on national resources, as well as local and state resources.

The Mitigation Grant Program Should Encourage The Implementation Of Multi-Objective Mitigation Strategies

Any hazard mitigation grant program should promote *responsible* floodplain management through community-based decision-making, encourage communities to build stakeholders at the local level, encourage individual accountability, promote local accountability for developing and implementing a comprehensive strategy and plan for the floodplain, encourage local governments to be proactive in understanding potential impacts of flooding and other hazards, and reward them for implementing programs of mitigation before the impacts occur.

Like the HMGP program, the proposed pre-disaster mitigation competitive grant program includes a list with several categories of projects eligible for funding. However, there is a tendency to promote acquisition of flood prone structures and exclude other mitigation measures from HMGP funding. While acquisition is a permanent approach to flood hazard mitigation, this effort can result in the failure to consider other mitigation options, many of which may be more appropriate and more cost effective.

Additionally, the focus on acquisition does not encourage comprehensive mitigation planning. When HMGP funding for local projects is limited to one or two categories of projects, many see the mitigation planning requirement as a paperwork exercise completed to fulfill someone else's funding requirement. As a result many local officials do not view mitigation planning as a useful tool to better protect their communities from the next disaster, or to solve multiple community hazard concerns or other community problems.

The best mitigation program is one that is supported by local officials, the private sector, and the public; that utilizes all possible public and private resources; and that protects the natural and beneficial functions of the floodplain. A locally led, multi-objective management planning process is the best way to develop such a program.

Mitigation grant programs should encourage local governments to look at the full range of mitigation strategies and measures. Furthermore, they should allow selection of all strategies and measures that will help reduce current and future flood losses, as well as, losses from other community hazards in order to produce disaster resistant communities.

Add Floodplain Mapping To The List Of Eligible Mitigation Projects

If funded, the proposed \$300 million mapping initiative will take 6 to 10 years to complete. In the meantime floods will be occurring in communities with outdated maps. The Association encourages FEMA to add floodplain mapping projects to the list of eligible mitigation projects where there are clear errors in mapping or where the maps are very old in a developing community. Without remapping, redevelopment will often occur at lower elevations and be subject to future flooding and disaster costs. This is not "sustainable development."

Maintain Commitment To The National Flood Insurance Program

Over its 30-year history, staff positions originally authorized for the National Flood Insurance Program have been reassigned to other missions. The Association encourages FEMA not to lessen its commitment to implementing the NFIP in order to undertake the pre-disaster 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.

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RESOLUTION

WHEREAS, the Association recognizes that FEMA has made great strides in mitigation programs over the last ten years, and

WHEREAS, post-flood mitigation has proven to be an invaluable part of local and state floodplain management programs; and

WHEREAS, post-flood mitigation activities reduce flood losses and federal expenditures for disaster assistance, flood insurance claims and flood control projects; and

WHEREAS, the single most important flood hazard mitigation activity is compliance and effective enforcement of floodplain management regulations; and

WHEREAS, there are many ways to mitigate against future flood losses and no person, community, state or agency should focus on only one approach;

NOW THEREFORE, be it resolved by the North Carolina Association of Floodplain Managers, Inc. (Association) that:

1. The Association supports the Administration's request for increased funding to continue expansion of the pre-disaster mitigation work, but not at the expense of post-disaster funding.
2. The Association supports the development of a pre-approved list of acceptable project "categories," as one method of obligating funds quickly following a disaster. For those projects meeting pre-approval criteria, the money should flow to the state and local government immediately.
3. The Association supports the implementation of state and federal mitigation policies that lead to locally led, multi-objective programs utilizing a broad range of mitigation strategies.
4. The Association encourages FEMA and the Congress to ensure that hazard mitigation grant programs promote and reward responsible floodplain management and encourage communities to build stakeholders at the local level.
5. The Association encourages FEMA to add floodplain mapping projects to the list of eligible mitigation projects where there are clear errors in flood mapping. Without it, redevelopment will often occur at lower elevations, subject to future flooding and disaster costs. This is not "sustainable development."

6. The Association encourages FEMA not to lessen its commitment to implementing the NFIP in order to undertake the pre-disaster 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 THIS THE 10TH DAY OF SEPTEMBER, 2002.

Joseph B. Chapman
Secretary

William R. Tingle
Chairman