



# State Mitigation Planning Key Topics Bulletin: Mitigation Capabilities

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FEMA

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# 1. Introduction

The Federal Emergency Management Agency (FEMA) released the [State Mitigation Planning Policy Guide](#) (the Guide) in April 2022. The Guide is FEMA’s official policy on and interpretation of the mitigation planning requirements in the Code of Federal Regulations (44 CFR Part 201). The Guide updates the 2015 State Mitigation Plan Review Guide and Policy. It goes into effect on April 19, 2023. All state mitigation plans approved on or after April 19, 2023, must follow the updated Guide.

The State Mitigation Planning Key Topics Bulletins (“Bulletins”) are a series of documents providing advice and approaches to meet the requirements in the Guide. They supplement the Guide with “how-tos” and resources.

This bulletin is the third in the series. It covers state mitigation capabilities.<sup>1</sup>



**Figure 1. State mitigation capabilities include the programs, policies, staff, funding and other resources available to build resilience and reduce long-term losses. Images (top left to bottom right): FEMA Region 5 State of Illinois Mitigation Assistance Resource Guide; New York State Hazard Mitigation Plan; Minnesota State Hazard Mitigation Plan; Massachusetts State Hazard Mitigation and Climate Adaptation Plan.**

<sup>1</sup> In mitigation planning, “state” refers to the 50 states, Washington, D.C., and the five U.S. territories.

**Justice40** is a whole-of-government effort. It works to deliver at least 40% of the benefits from federal climate and clean energy investments to disadvantaged communities. Hazard mitigation plans are crucial in delivering those benefits. Mitigation capabilities should be assessed to understand whether communities face barriers to accessing resources. This assessment should also help the hazard mitigation plan reduce barriers to those resources. FEMA's grant programs, including Building Resilient Infrastructure and Communities (BRIC) and Flood Mitigation Assistance (FMA), advance Justice40. By reducing barriers for underserved communities, states support this whole-of-government approach and are better positioned to meet FEMA grant program requirements.

## 2. Mitigation Capabilities Overview

Mitigation capabilities are the resources a state can use to reduce risk and support resilience. Capabilities may be laws, regulations, plans, policies, programs, people, partners or funding. A capability assessment identifies the process used to carry out mitigation actions. Assessing state mitigation capabilities is a crucial part of mitigation planning. The mitigation strategy should be based on the risks in the risk assessment and the resources in the capability assessment. In the capability assessment, a state identifies, reviews and analyzes its current resources for reducing risk.

Each state has its own set of pre- and post-disaster capabilities. They exist across the state government, not just with the State Hazard Mitigation Officer (SHMO) or the state emergency management agency. Capabilities can also come from non-governmental or private sector partners. That is why states should bring partners from the seven sectors and community lifelines into the planning process. Stakeholder participation and cross-sector collaboration in the planning process can help determine state pre- and post-disaster hazard mitigation capabilities. It can also help assess areas for improvement. For more on working with partners in the capability assessment, see Section 4.

The capability assessment is not a list or report; it is an evaluation. It shows how the state gives resources to mitigation and how it uses resources other than FEMA's. It also notes where there are gaps that need to be filled. This assessment helps make a realistic mitigation strategy that will not stall due to a lack of resources. Gaps are common. When one is found, the state should use the mitigation strategy and address the gap over the approval period.

### Guiding Principle #3: Improve Mitigation Capabilities

FEMA set three guiding principles for developing or updating state mitigation plans in the Guide. Guiding Principle #3, Improve Mitigation Capabilities, recognizes that mitigation capabilities are continually improving. To grow mitigation capabilities requires knowledge of how state governments can contribute to greater resilience. States can do so by including

mitigation in planning processes, policies and programs. States can work with FEMA to support and advance coordination and mitigation capabilities.

The state capability assessment is key when identifying statewide and local mitigation planning efforts.<sup>2</sup> An evaluation looks at how current activities and programs relate to communities' capabilities. It is helpful for learning whether a state needs to implement new initiatives. If states find a need for new activities or programs, they can add those action items in their state mitigation plan. States should share the results of their capability assessment with local governments.

Each state's capability assessment is different. This is because their capabilities are unique. There is no one-size-fits-all way to evaluate the state pre- and post-disaster capabilities. Some states organize their capabilities by agency or department. Others choose to organize by type of capability. However, the state planning team chooses to inventory and organize its assessment, it is important to know if each capability supports, facilitates or conflicts with risk reduction. Capabilities that support mitigation should be encouraged and strengthened. The state planning team should think about how to amend capabilities that conflict with hazard mitigation. This helps to better support risk reduction.

### Capabilities: More Than Laws and Programs

State capabilities are not limited to the legal, regulatory and programmatic framework for mitigation. States may want to add an assessment of "people-powered" capabilities. These could be administrative, technical, volunteer or advocacy group capabilities. These can help reduce risks to socially vulnerable and underserved communities. The state should also include an assessment of any technical or data tools available to support hazard mitigation.

## 3. Steps to Assess State Mitigation Capabilities

This bulletin explains how to evaluate the state mitigation capabilities. It also covers documenting how the state supports local capability building. There are four recommended steps:

1. Evaluate state laws, regulations, policies and programs.
2. Talk about state funding capabilities.
3. Describe and analyze the effectiveness of local government mitigation capabilities.
4. Describe the state's process for supporting local government mitigation planning.

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<sup>2</sup> The definition of local governments at 44 CFR § 201.2 includes any Indian tribe or authorized tribal organization, or Alaska Native village or organization. Tribal governments who would like the option of being a subrecipient under the state must submit their plan to the State Hazard Mitigation Officer for review and coordination (44 CFR § 201.7[d]). Throughout this bulletin, "local government" includes local governments and tribes who choose to coordinate their mitigation plan with the state.

### 3.1. Step 1: Evaluate State Laws, Regulations, Policies and Programs

States have a vast web of pre- and post-disaster capabilities to mitigate hazards. The capability assessment must evaluate the state's laws, regulations, policies and programs that relate to hazard mitigation. This evaluation must note which capabilities improve or impede resilience to future hazard events and other future conditions, including climate change.

This includes:

- State land use laws, enabling legislation and plans.
- State building code adoption and enforcement.
- State administration of the National Flood Insurance Program (NFIP).
- State participation in FEMA's flood hazard mapping program, Risk Mapping, Assessment and Planning (Risk MAP).

State land use laws, enabling legislation and plans drive how the state governs growth and development. These authorities may be delegated to local governments. The NFIP helps grow the resilience of communities to flood hazards. It also helps lower the financial impact of flood losses to property. Compliance with the NFIP and buying flood hazard insurance reduces disaster losses.

#### Questions to Consider When Assessing Capabilities

- What is the legal framework for hazard mitigation and land use planning in the state? Is there relevant enabling legislation?
- What laws support and facilitate hazard mitigation? Do any laws support activities that put people, assets and/or infrastructure at risk to natural hazards?
- What are the planning and development authorities in the state? Does the state have the authority to manage or regulate development in hazard-prone areas through land use laws?
- Are there statewide model building codes or ordinances that support risk reduction?
- Which state agencies have had a role in risk reduction and hazard mitigation in the past? What programs within those agencies address hazard mitigation?
- Are there different pre- and post-disaster mitigation programs?
- What are the state's capabilities to assess vulnerability, climate resilience and risk reduction?
- What tools, policies and programs have helped meet mitigation objectives? Which have been less effective?

The capability assessment must summarize obstacles and challenges. The summary must have proposed solutions for these challenges. Note strategies to help deal with any challenges to implementing and enforcing building codes. This summary makes sure that the mitigation strategy fills gaps in available resources.

### Example: New York State's Capability Assessment

State mitigation capabilities include a range of policies, programs, regulations and data. These support mitigation planning and implementation.

The 2019 New York State Hazard Mitigation Plan made an interactive [Statewide Mitigation Capabilities](#) table to identify the agency/organization and the capability. Users can view it, download the information, and add their own agency/organization program to the database. This supports ongoing maintenance of the capability assessment.

#### 3.1.1. STATE LAND USE LAWS, ENABLING LEGISLATION AND PLANS

How the state allows land to be developed can have a large effect on hazards. Land use laws, ordinances, policies and plans can:

- Prevent or limit development in hazard prone areas.
- Direct future growth to safer areas.
- Protect existing development in hazard prone areas.

Land use is important to reducing hazard risk. Because of this, the state mitigation plan must describe its land use laws, enabling legislation and plans. The plan should describe each of these capabilities. Include the year they were adopted or updated, their authority and their purpose. It is also good to evaluate if these laws support or detract from mitigation goals. Some states delegate land use authority to local governments. If relevant, explain which authorities are delegated. It can also be helpful to describe how the local governments manage land use and zoning. The American Planning Association made a [survey of state land use and natural hazard laws](#). The survey can support this step.

The plan must also describe the state's laws for adopting and enforcing building codes. Some states may have a statewide building code; others may not. If your state does have a statewide building code, be sure to include the adoption year and the model code year. Also state whether the code includes hazard-resistant provisions. FEMA has [resources](#) for building codes and building science.



## Building Codes and Mitigation Capabilities: Connecting Hazard Mitigation Tools

Hazard-resistant building codes are crucial for resilience. Building codes can:

- Help to avoid losses of life and property.
- Support a state applying for BRIC program funding. States with a mandatory hazard resistant building code get more points in the BRIC technical evaluation. Building code adoption and enforcement efforts are also eligible capability- and capacity-building activities.

There are several resources to help states keep track of and support the adoption and enforcement of building codes. Review the:

- [Building Code Adoption Tracker \(BCAT\)](#). This FEMA resource notes jurisdictions which have adopted building codes.
- [Inspect to Protect website](#). This Department of Homeland Security resource shows how well current building codes mitigate hazards.
- [Building Codes Adoption Playbook](#). This FEMA resource helps states and jurisdictions promote, adopt and enforce up-to-date building codes.
- [Building Codes Save: A Nationwide Study of Loss Prevention](#). This resource demonstrates how up-to-date building codes can help to reduce property losses caused by natural hazards.

### 3.1.2. STATE ADMINISTRATION OF THE NFIP

The NFIP supports flood risk reduction before and after disasters. It helps reduce the socioeconomic impact of floods. With this program, at-risk property owners and renters can purchase federal flood insurance policies to mitigate financial losses after a flood. Participation in the NFIP requires communities to adopt and enforce floodplain management policies to reduce the effects of flooding.

The Community Rating System (CRS) is part of the NFIP. It is a voluntary incentive program. It recognizes and encourages community floodplain management activities that go beyond the minimum NFIP requirements. This is done by giving flood insurance premium discounts to property owners in communities participating in the [CRS program](#). Communities can earn credit points for many local floodplain management activities. The number of points determines the discounts that policyholders receive.

The state must describe how state agencies work together to administer the NFIP. The state hazard mitigation plan should note the agencies or departments managing the administration of the NFIP and CRS. It should also assess available staffing and resources at the state level. This may include a discussion of how the state uses support services like Community Assistance Visits (CAVs) or Community Assistance Contacts (CACs). CAVs and CACs are two ways FEMA and state agencies

(acting on behalf of FEMA) can identify community floodplain management program challenges. They can also be used to provide technical assistance to resolve these issues. They are a crucial part of making sure communities meet the requirements of the NFIP.

### Example: Using the CAP-SSSE Tiered State Framework

The Community Assistance Program-State Supported Services Element (CAP-SSSE) is a cooperative agreement. It gives states funding to support their implementation of NFIP floodplain management activities.

FEMA developed the CAP-SSSE Tiered State Framework. It helps FEMA recognize, invest in, and incentivize state efforts to build their NFIP-related capabilities. The Tiered State Framework has three tiers:

- Foundational: The state program meets the minimum eligibility requirements.
- Proficient: The state program functions well and meets expectations.
- Advanced: The state program is considered “best in class” and performs above expectations.

States do a self-assessment as a part of this process. This self-assessment can inform the mitigation capability evaluation.

This discussion must include:

- Changes in participation: changes in the total number of communities that participate in the NFIP and CRS in the state. This information is available from the [NFIP Community Status Book](#).
- Changes in insurance coverage: shifts in the number of policies in force.
- Other NFIP-related trends: shifts in the number of and class of CRS communities or other state-observed trends.

States can give this information as a narrative summary. They can also include tables with more specific community data that relate to the NFIP and CRS. The state capability assessment must also describe how the state supports communities that participate or have interest in the CRS. This may include training, technical assistance or data support.

Substantial damage administration is a crucial post-disaster capability under the NFIP. It refers to how the community and FEMA assess the building damages that happen after a disaster. It determines what is needed to repair a structure. This provision of the NFIP says that when the cost to repair or improve a structure equals or exceeds 50% of the structure’s pre-damage market value, the structure must be brought into compliance with current NFIP standards, building codes and other standards. The state must describe how it supports communities in substantial damage

administration. This could include training programs, how the state monitors community performance, and how it works with communities after disasters.

States must also summarize state-owned or operated structures that are at high risk of flooding. This includes repetitive and severe repetitive loss structures. This summary can be a table or map(s) of the number and type of such structures. It is important to aggregate this data to prevent someone from identifying or guessing the address of a high risk property. States should work with FEMA to get these data and work to support communities to mitigate risks.

Finally, it is important that the capability assessment identifies any implementation challenges for the NFIP. These challenges may come up at state planning team meetings. They may also be documented during other regular coordination with FEMA. The assessment should also describe what the state is doing to deal with those challenges.

### **3.1.3. STATE PARTICIPATION IN FEMA'S FLOOD HAZARD MAPPING PROGRAM**

FEMA works with federal, state, tribal and local partners to identify flood risk and help reduce that risk through its flood hazard mapping program, Risk MAP. The Risk MAP program provides high quality flood maps, information and tools. These help to better assess the risk from flooding. The program also gives planning and outreach support to communities. This helps them act to reduce or mitigate flood risk. States must include a discussion of their capabilities related to, and participation in, the Risk MAP program. The state should give information about watersheds and communities where mapping updates are taking place. It should also discuss how the state supports the Risk MAP program. For example:

- How does the state share data and information to aid the creation of Risk MAP products?
- How does the state encourage the use of Risk MAP products in local hazard mitigation plans (thus growing the capabilities of local communities to communicate risk)?
- How does the state teach its population about flood risk in the state through Risk MAP?

### **3.1.4. INCLUDING OTHER HAZARD MITIGATION PROGRAMS**

Participation in and support of the NFIP, CRS and Risk MAP are important flood-focused capabilities. However, states should also talk about the administration of, or participation in, any other hazard-specific mitigation programs. For example, the Washington Coastal Hazards Resilience Network has tools and resources specific to a [tsunami hazard](#). Utah's earthquake risk warrants the development of [several tools](#) for earthquake mitigation. Other parts of the country may participate in federal or state wildfire, drought, earthquake or tornado mitigation programs. Describing participation in these programs may overlap with the discussion about local coordination and mitigation capabilities (see [Step 4](#)). This overlap may include a discussion about growing local communities' capacity to understand, communicate and mitigate their risks.

This step of the capability assessment is not just a list or report of existing programs. It is a comprehensive evaluation based on the state's existing capabilities. It shows the state's commitment to mitigation. This process will help the state find a wide range of resources that can help it carry out mitigation activities. It will also show areas for improvement.

### Using the Threat and Hazard Identification and Stakeholder Preparedness Review

The Threat and Hazard Identification and Risk Assessment (THIRA) helps communities identify hazards and threats of concern and provide context for them. It also helps identify and set a capability target based off of the natural hazards or manmade threats selected. In the Stakeholder Preparedness Review (SPR) communities identify their current capability, capability gaps, and the role grants play in closing those gaps. Both processes are important tools to reduce risk.

The THIRA/SPR evaluates the state's capabilities across the following areas:

- Planning (policies, plans, procedures, mutual aid agreements, strategies, etc.).
- Organization (teams, personnel, overall organizational structure, and leadership).
- Equipment (equipment, supplies, and systems needed to complete work).
- Training (available training and methods of delivery).
- Exercises (exercises and actual incidents that demonstrate the ability to meet targets).

The THIRA planning capabilities may be the most closely aligned with the state's assessment of capabilities within its laws, regulations, policies and programs. The state's THIRA/SPR takes this capability assessment and sets targets for seven mitigation core capabilities:

- Threats and hazard identification.
- Risk and disaster resilience assessment.
- Planning.
- Long-term vulnerability reduction.
- Community resilience.
- Public information and warning.
- Operational coordination.

States should leverage the THIRA/SPR to inform the hazard mitigation plan's capability assessment. It can reduce the duplication of effort to compile mitigation capabilities. The THIRA should be complementary or may be the primary source for the state mitigation plan capability assessment. More information on the THIRA/SPR process is in the [THIRA/HIRA Comprehensive Preparedness Guide \(CPG\) 201](#). More information on how to align the THIRA/SPR and Mitigation Planning is found in this [job aid](#).

### 3.2. Step 2: Discuss State Funding Capabilities for Hazard Mitigation

After assessing pre- and post-disaster policies and programs, states must discuss and evaluate their funding capabilities. These are the resources that the state can access or use to fund mitigation efforts. This is a general discussion of funding capabilities used for hazard mitigation. The mitigation strategy will have more specific funding resources for each mitigation action or project.

The state should note positive aspects. It should also share areas where it needs to seek more funding sources or support match requirements. States must discuss the use of their own funding, financing, and/or revenue generating abilities, FEMA funding and non-FEMA federal funding. States may also want to talk about their ability to administer and effectively spend grant funding. There are many helpful resources for states to find funding. For example, FEMA Region 5 made [Mitigation Assistance Resource Guides](#) for all states and tribal nations in the region. FEMA Region 2 also made [Mitigation Funding Resource Guides](#) for all states within the region. The intent of these guides is to be included in state and local hazard mitigation plans to match funding to mitigation actions.

States should look across the agencies, departments and stakeholders taking part in the planning process to find state funding sources. These sources can include resources earmarked for mitigation projects that protect state assets and sources that can be used for local projects. State funding for mitigation should not be limited to grant programs. For example, think about the use of low-interest economic development or infrastructure protection loans, sales taxes or other in-kind funding sources that have been used in the past. If there are dedicated streams of mitigation funding or other incentives available for mitigation, add them to this discussion.

#### Example: Funding Programs in Nevada

The State of Nevada's Hazard Mitigation Plan has a robust matrix of pre- and post-disaster policies, programs and capabilities. It notes state funding agencies at all levels of government, their programs and what each one does.

**Table 4-3. Pre- and Post-Disaster Hazard Management Policies, Programs, and Capabilities**

Funding Agency (Federal, State, Local, Private)	Hazard	Program	Type of Hazard Management Capability		State Involvement			Description of Program, Policy, Regulation; links
			Pre- Disaster	Post- Disaster	Support	Facilitate	Funds	
EPA Bureau of Water Quality Planning (BWQP) may have a grant from EPA to fund this type of program/project in NV)	Drought and Flood	Clean Water Act Section 319 Grants	√		√	√	√	This program provides grants to state agencies to implement non-point source programs, including support for nonstructural watershed resource restoration activities.
National Institute of Science and Technology (NIST); FEMA; USDHHS; Department of Interior, USGS; NSF (Partnering with UNR-NBMG, Seismo Lab, UNLV)	Earthquake	National Earthquake Hazard Reduction program (NEHRP) in Earth Sciences	√		√	√		NEHRP Provides grants for seismic mapping for U.S. HAZUS loss-estimation modeling, fault-hazard identification, liquefaction-hazard identification, landslide-hazard identification, probabilistic seismic hazard analysis, ground-shaking microzonation, basin-effect analysis, earthquake process research. <a href="http://www.nehrp.gov/contracts/solicitations.htm">http://www.nehrp.gov/contracts/solicitations.htm</a>
CDC, USD	Epidemic	Programs for prevention of epidemic disease	√	√	√	√		CDC Provides funding for preparation for and prevention and control of diseases. <a href="http://emergency.cdc.gov/">http://emergency.cdc.gov/</a>

The funding capabilities discussion must share how the state has used FEMA funding for hazard mitigation. This includes the Hazard Mitigation Assistance (HMA) programs<sup>3</sup>:

- [BRIC Program.](#)
- [FMA Program.](#)
- [Hazard Mitigation Grant Program \(HMGP\).](#)
- [Hazard Mitigation Grant Program Post-Fire.](#)

The funding capabilities should also address the state’s use of Public Assistance (PA) Mitigation and the Rehabilitation of High Hazard Potential Dam (HHPD) grant program, if those funding mechanisms have been or may be used. This discussion is not just a list of which FEMA programs were used in the past five years. It should include a narrative of how the funds were used to reduce risk and build resilience. States may want to add a list of the amount of funding from each program. This

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<sup>3</sup> While the BRIC program largely replaced the PDM program, Congress authorized PDM funding in 2022. It may do so again. If so, include the use of PDM funds in the plan.

discussion could cover where funds were spent and if state funds were used to cover the non-federal match. It can also cover what kinds of projects or plans were funded under the FEMA programs.

Many federal agencies have programs and funding to support mitigation and resilience. More and more states are using non-FEMA federal funding to support risk reduction. These include funding sources like the [Department of Housing and Urban Development's Community Development Block Grant Mitigation funds](#). Other mitigation funding sources can be found in FEMA's [Mitigation Resource Guide](#). The discussion of funding capabilities must include a narrative and/or data on how the state used other federal programs and funding for mitigation. When looking at state funding capabilities, it is important to remember that mitigation actions may need help from many different partners to implement. Projects may be implemented using many kinds of funding sources, including:

- Federal grants and funding.
- State-budgeted funding to match federal grants or to support state grant programs.
- Capital improvement plans.
- Non-governmental grant or loan programs.
- Property owner funding and/or finances.

The technical assistance to implement a mitigation action may come from engineers, technical experts, grant writers and managers, and project champions from all levels of government and community groups. Think about the full range of funding capabilities and funding partners.

### Enhanced State Plan Requirements Related to Mitigation Capabilities

An enhanced state mitigation plan documents a proven commitment to long-term risk reduction across the state. Being enhanced recognizes a state's ongoing and coordinated work to reduce losses from natural hazards, protect life and property and create more resilient communities. Enhanced states support a holistic mitigation program that is integrated across partners, staff and programs. Their commitment to mitigation is shown in the plan. It is also shown in how the state functions day to day. A big focus for enhanced states is showing that their capabilities go beyond the minimum requirements. They also make full and effective use of their own programs, FEMA programs, other federal programs and nongovernmental resources.

Enhanced states get an extra 5% in Hazard Mitigation Grant Program (HMGP) funds after a disaster. This means they receive 20% of estimated eligible Stafford Act assistance instead of 15%. Enhanced states share the responsibility for reducing risk across state agencies and departments. For more information, review Section 4 of the Guide.

### 3.3. Step 3: Describe and Analyze the Effectiveness of Local Mitigation Capabilities

Disasters are inherently local events. The state capability assessment must look at how effective local mitigation capabilities are. It is the state's job to coordinate all state and local mitigation activities. This support makes sure that communities are aware of data, resources and state priorities for mitigation that should be included in local plans.

Local mitigation capabilities and strategies also inform the state plan's mitigation priorities. This step is often called the "local roll-up." It makes sure that the state understands local capabilities. It also gives the state a chance to identify and review local mitigation capabilities. Finally, it helps the state develop a process to support local mitigation efforts. Think about making a local mitigation capabilities tracker and asking for updates when a local plan is submitted for FEMA approval. Update the tracker when new information is shared.

Including local mitigation capabilities does not mean that the state must talk about every capability identified in local plans. Instead, it must have a summary of current local policies, programs, funding and other capabilities of communities to reduce hazards. Think about these questions:

- Do local governments adopt and enforce any model codes or ordinances like the International Building Code? If so, what are they?
- Do any local governments go beyond federal and state minimum floodplain management standards? If so, what are those higher standards?
- Do local governments have programs that support vulnerable communities, especially those with both natural hazard risk and socially vulnerable populations?
- Do any local governments have capabilities that target climate change or adaptation work?
- Have public investment policies at the local level caused problems that would conflict with state or local mitigation goals?
- Have any communities passed hazard-specific zoning or land use policies?
- Do any communities give incentives for hazard mitigation or hazard-resistant design through their policies, programs and capabilities? Have they helped reduce risk?
- Have any communities been notably successful in using resources for mitigation?
- How could local capabilities and actions be shared and encouraged statewide?

These questions inform the state's description of the effectiveness of local mitigation policies, programs and capabilities. Part of evaluating effectiveness is talking about the challenges with using the capabilities. Challenges may include limited funding and/or staff. The discussion of challenges should include any gaps in aiding underserved communities. It should also include challenges that



come from the impacts of climate change. Questions to consider when evaluating such challenges include:

- Do any capabilities disproportionately benefit wealthy communities?
- Do any capabilities actively increase the vulnerability or risk exposure of underserved and socially vulnerable communities?
- Are the capabilities able to address the effects of climate change on local populations?

Where there are challenges, there are often opportunities. The evaluation of the effectiveness of local mitigation capabilities must also discuss chances to implement mitigation actions through local government capabilities. For example, if the state delegates its land use authority to local governments, they can funnel development away from hazard prone areas or protect existing development. Local resilience funding sources can pay for mitigation actions. These opportunities may also include emerging capabilities and local tools, policies and programs that are effective at meeting mitigation goals.

### Spotlight on High Hazard Potential Dams

The Water Infrastructure Improvements for the Nation (WIIN) Act added a new FEMA grant program. The [Rehabilitation of High Hazard Potential Dam \(HHPD\) Grant Program](#) gives technical, planning, design and construction assistance grants. This program requires states and jurisdictions where the dam is located to have an approved mitigation plan that includes all dam risk. The Guide outlines the state mitigation plan requirements for this grant program. Local mitigation plan requirements can be found in the [Local Mitigation Planning Policy Guide](#) (FP-206-21-0002, April 19, 2022).

In the Guide, the HHPD requirements are briefly referenced under the plan elements (planning process, risk assessment, etc.) that link to the HHPD requirements. The full list of HHPD requirements is listed in Section 3.9. The HHPD requirements do not need to be addressed in a separate section of the plan. They can be woven into the appropriate section.

If the state is interested in HHPD funding, the plan must describe and analyze how effective local mitigation policies, programs and capabilities that address high hazard dams are. It must also describe the criteria for prioritizing funding for high hazard potential dams.

## 3.4. Step 4: Describe the State's Process for Supporting Local Mitigation Planning and Funding

The state's responsibility for coordinating all state and local mitigation activities includes:

- Supporting the development of approvable local mitigation plans through training and technical assistance.

- Making funding available for planning, especially use of up to 7 percent of Hazard Mitigation Grant Program funding.
- Reviewing, and, in some cases, approving, local mitigation plans. Under Program Administration by States, some states are delegated local plan approval authority.
- Prioritizing jurisdictions for funding.

Many communities need help to update or develop plans and carry out mitigation actions. This is notably true of small communities with few or no resources. States are responsible for providing technical assistance and training to local governments. The state mitigation plan must explain how the state supports the development and update of approvable local mitigation plans. This support includes training and technical assistance. It also includes funding plan development and updates. Explain what trainings are offered and how local governments can ask for them. Share how often trainings are offered by FEMA and the state, if they are offered with partners and how many people attend. Talk about any training that has been requested but are not yet ready. These gaps can go in the state mitigation strategy.

States must describe the process used to give technical assistance and funding related to plan development. Technical assistance goes beyond traditional classroom lectures. It could include:

- Giving state risk assessment data for use in local plans.
- Joining and giving guidance at planning meetings.
- Working with communities to make sure their plan will be approved on the first submission to the state and FEMA.

The process to provide funding could include how the state prioritizes communities for planning grants. It should also outline if and how the state gives non-FEMA funding for mitigation plans. Finally, it should share if the plan gives funding for planning-related activities that support the mitigation plan.

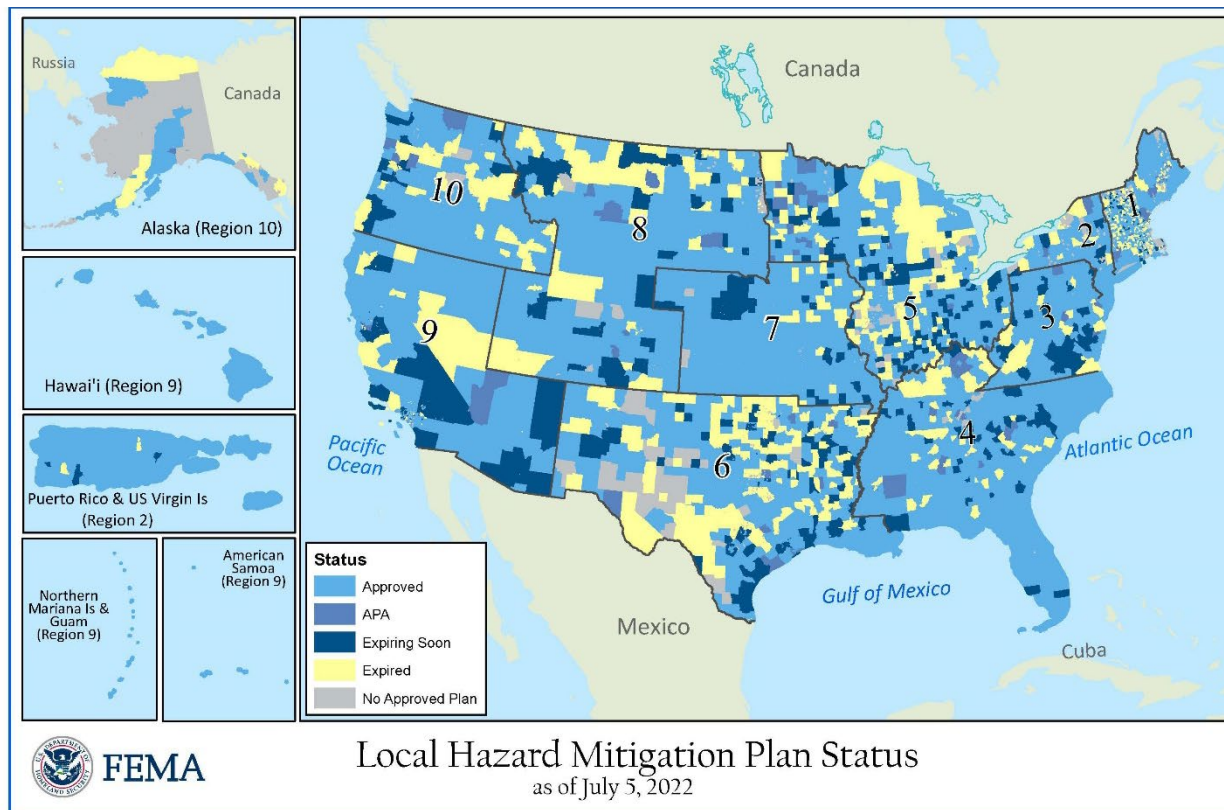


**Figure 2. State Program Consultations are used to strengthen FEMA-State relationships through annual meetings. This image is of an annual mitigation workshop for state and federal partners in Iowa. Image: FEMA.**

The state plan must summarize any barriers to developing or updating, adopting or implementing mitigation plans. Barriers may include:

- Lack of perceived value in developing a plan.
- Individual communities not completing the adoption and approval process. States can receive data from FEMA on plan status and tracking.
- Limits to funding or technical assistance.
- A lack of political will or resources to implement mitigation plans.
- Gaps and disparities in serving underserved communities.
- Impacts of climate change, demographic shifts, and changing development patterns on communities.

The state must ground this summary of barriers in an analysis of plan and jurisdiction coverage trends. This analysis will show where the state can focus resources to grow local plan adoption and approvals. States should work with FEMA regional staff to access the most updated hazard mitigation planning information and coverage data. In addition to descriptions, a map of statewide plan status coverage can be helpful. Get the data from the FEMA regional mitigation planners, your plan review records or the interactive [Hazard Mitigation Plan Status map](#).



**Figure 3. Barriers to local mitigation planning must be based on an analysis of plan and jurisdiction coverage trends. Image: FEMA.**

The plan must talk about how the state will overcome any identified barriers. The approaches to address the barriers lay the groundwork for improved future planning and implementation efforts. Think about adding concrete actions that support the approaches in the state mitigation strategy.

### Considerations for Plan Updates

Updated state plans should talk about how training, funding and technical assistance have changed since the last plan's approval. The updated plan should also talk about how technical assistance, training and funding will help make local plans more effective. States should pay special attention to how actions may affect socially vulnerable communities or expose these communities to further hazard risk. This discussion can include:

- Assistance to communities to add effective and feasible mitigation projects to their mitigation strategies.
- Planning workshops or trainings.
- Planning grant application development.
- Improved risk assessment, hazard data or Hazus technical assistance.

- Improved plan review process training and technical assistance to reduce the number of plan revisions needed to gain approval pending adoption status.
- Accessible engagement and training with a focus on reaching and including underserved communities and socially vulnerable populations across the state.

The state plan should describe how the state has encouraged disaster-affected communities to update their mitigation plans. This update will use disaster information to reflect changes in vulnerability or in state priorities.

Another part of state support to local mitigation planning is the review process for local mitigation plans. The plan must describe the process and timeframe used to train communities and review and submit approvable local mitigation plans to FEMA. The state should think about these questions when documenting the plan review and approval process:

- Is training and technical assistance provided when local governments are applying or scoping planning grant applications? Is such training and technical assistance provided after planning grant awards or when the planning process starts?
- Does the state provide training and technical assistance during the plan development/update? This could occur after the risk assessment to inform the mitigation strategy, for example.
- Are local plans reviewed only when there is a complete draft? Are partial submissions of plan sections allowed under the state process?
- If a plan does not meet all requirements after state review, what is the process for revision and resubmission? Does the state track which elements commonly require revision and then work to provide training or technical assistance to reduce any burden on local and state planners?
- How does the state support and communicate local plan adoption as a requirement to close out FEMA HMA planning grants and to finish the plan approval process to meet one of the conditions of eligibility for HMA project grants?

If the state cannot submit approvable plans or adoption resolutions, the plan must share what the state will do to grow state and local planning capabilities.

The state mitigation plan and local mitigation plans should work together to build a more resilient state. This means that the plan must describe the process and time frame used to coordinate and link risk assessments and mitigation strategy information between local and state mitigation plans. Depending on the number of communities in the state, establishing an efficient process of linking risk assessments and mitigation strategies from local mitigation plans may be a challenge.

States may want to get local information as the SHMO or state mitigation planner reviews plans. The plan reviewer may look for themes, project types and vulnerable areas. They may also note where the local plan aligns with or strays from state priorities. Some states may delegate this job to the

state planning team or a subcommittee each year. This may include tasking them with identifying points of connection and suggesting updates to the state plan based on local information. If this process was not successful in the previous planning cycle, states should talk about why the process failed. They should then make changes as needed.

### Example: Ohio’s Mitigation Information Portal

The State of Ohio uses its [Mitigation Information Portal](#) to capture local risk assessment data and mitigation priorities. It does this as plans are submitted and reviewed. Local partners add their data into this online system. The system lets the state compare local mitigation actions, hazards and vulnerabilities with ease. The information is openly available online for jurisdictions to use. The state uses these data in the state planning process.

Hazards	Structures At-Risk				Damage in Dollars			
	Residential	Non-Residential	Critical	Total	Residential	Non-Residential	Critical	Total
Coastal Erosion	-	-	-	-	-	-	-	-
Dam/Levee Failure	965	73	6	1,044	\$22,540,890	\$30,551,300	\$9,500,000	\$62,592,190
Drought	0	0	0	0	\$0	\$0	\$0	\$0
Earthquake	7,200	3,000	145	10,345	\$1,032,590,000	\$778,720,000	\$170,500,000	\$1,981,810,000
Flooding	2,006	198	6	2,210	\$130,093,500	\$68,709,180	\$8,000,000	\$206,802,680
Invasive Species	0	0	0	0	\$0	\$0	\$0	\$0
Land Subsidence	-	-	-	-	-	-	-	-
Mud/Landslide	-	-	-	-	-	-	-	-
Severe Summer Storm	0	0	0	0	\$0	\$0	\$0	\$0
Tornado	1,115	98	34	1,247	\$59,000,000	\$107,800,000	\$169,250,000	\$336,050,000
Wildfire	0	0	0	0	\$0	\$0	\$0	\$0

The last piece of state support to local mitigation planning and capability building is how the state prioritizes funding. The plan must describe the criteria it uses to prioritize jurisdictions for planning and project grants. Prioritizing communities to receive planning and project grants is crucial in identifying and directing investments to the most at-risk locations. The most at-risk communities are those with the highest vulnerability. This includes social vulnerability. They may also be the highest risk properties due to climate change. They may include areas under intense development pressure. While the primary criterion for prioritizing grants must be the benefit-cost analysis, the plan can still think about benefits other than money. For example, many states prioritize acquisition projects for repetitive loss properties above other project grants. They do so because those activities eliminate the possibility of losses on the state’s most vulnerable structures. However, acquisition projects may remove affordable housing. That may put a strain on socially vulnerable or underserved populations. This may serve as an opportunity to work with the state and local housing authorities to increase affordable housing stock in low-risk areas. The state planning team should determine the exact set of criteria used to decide if the benefits of a project will be worth more than its cost.

Completing this step will document how the state prepares for, reviews and approves local mitigation plans. It will help to develop a common understanding of risk. It will also help align the mitigation strategies of state and local plans.

## 4. Leveraging Partners to Assess Capabilities

All levels of government have a role in hazard mitigation. This is discussed in the State Mitigation Planning Key Topics Bulletin: Planning Process. Local, state and federal governments each contribute to mitigation actions and managing hazards. The state has many chances to review the specifics of how the hazard mitigation plan is implemented. The state can evaluate the process, explain the process to partners implementing a project for the first time and identify actions that improve the process and sell successes.

Mitigation also benefits from partnerships between the seven sectors noted in the [National Mitigation Framework](#) and the community lifelines. [Community lifelines](#) are the fundamental services in a community. When they function, all other aspects of society can function. They are critical for maintaining public health, safety and economic viability. In the context of state mitigation planning, lifeline owners and operators can be planning partners. Lifelines are also assets the state includes in the risk assessment. Each sector and lifeline contributes to the pre- and post-disaster capability of the state.



**Figure 4. The community lifelines.**

Community lifelines provide mitigation capability considerations. They also give deeper analyses of local and state capabilities. For example, analyzing transportation networks may find mitigation capabilities within the state’s Department of Transportation. Community lifelines and sectors can help find and leverage important mitigation capabilities to carry out the state’s hazard mitigation plan.

Sector	Lifeline(s)	Capabilities
<b>Emergency Management</b>	Safety and Security; Hazardous Materials; Food, Water, Shelter	<ul style="list-style-type: none"> <li>▪ These agencies may lead hazard mitigation planning. They often have a leading role in mitigation grants management.</li> <li>▪ They are essential for supporting local planning and growing local capabilities.</li> </ul>
<b>Economic Development</b>	N/A	<ul style="list-style-type: none"> <li>▪ These partners may give technical assistance to small business owners, such as <a href="#">U.S. EDA’s Community Economic Development Strategy (CEDS)</a>. These partners can link small businesses to available loans and grants.</li> <li>▪ They may be able to help others learn laws and policies that deal with development.</li> </ul>

Sector	Lifeline(s)	Capabilities
<b>Land Use and Development</b>	N/A	<ul style="list-style-type: none"> <li>▪ These partners oversee the state’s land use framework. They also manage building code adoption and implementation.</li> <li>▪ They can help the planning team understand what regulations can direct development away from hazardous areas. They do so through local land use planning as well as zoning and development and building codes and standards.</li> </ul>
<b>Housing</b>	Food, Water, Shelter	<ul style="list-style-type: none"> <li>▪ These partners assist in providing safe and affordable housing before, during and after disasters. Their capabilities can support resilience and recovery work.</li> <li>▪ The housing sector can help identify socially vulnerable communities and the challenges that those communities face. It can make sure that the mitigation strategy directs new and redeveloped housing away from hazard areas.</li> </ul>
<b>Health and Social Services</b>	Health and Medical	<ul style="list-style-type: none"> <li>▪ These partners may add outreach and education capabilities. Many health and social services groups have strong outreach functions.</li> <li>▪ These partners can link socially vulnerable populations to grants and other help. They can do so before and after a disaster.</li> </ul>
<b>Natural and Cultural Resources</b>	N/A	<ul style="list-style-type: none"> <li>▪ These partners may have guidance or best practices for how to treat environmental resources and historic or culturally significant properties. They may have access to funding streams to aid mitigation projects in these spaces.</li> <li>▪ They may have in-depth knowledge of climate change and/or adaptation resources. This can help to identify future risks and plan accordingly.</li> </ul>
<b>Infrastructure</b>	Energy; Communications; Transportation; Food, Water, Shelter	<ul style="list-style-type: none"> <li>▪ These partners own and manage critical assets in the state. They may help with funding and/or constructing projects that reduce risk from natural hazards.</li> <li>▪ Refer to <a href="#">Protecting Community Infrastructure, Hazard Mitigation Planning: Practices for Land Use Planning and Development near Pipelines (2015)</a> or <a href="#">EPA Hazard Mitigation Guide for Utilities for more information related to infrastructure capabilities.</a></li> </ul>



Representatives of diverse sectors from all levels of government, organizations and business all play a role in hazard mitigation. This includes organizations that support and can speak to the needs of socially vulnerable and underserved communities. Calling on stakeholders lets the state capability assessment go beyond the capabilities of the state planning team. This gives a broader look at all current capabilities. Integrating the tools and expertise that each partner brings to the process strengthens the state hazard mitigation plan. These strengths stem from champions who drive actions, funding streams that match project goals and experts who can give technical assistance. Linking capabilities to the mitigation strategy means actions are more likely to be carried out.

## 5. Updating the Capability Assessment

All state mitigation plans are updates. A core set of state mitigation capabilities will stay the same between plan updates. Others will change. The capability assessment must summarize what has changed since the last plan was approved. The state may have identified laws, regulations and policies that could be changed to support mitigation actions. It may also have removed provisions that conflict with previously approved mitigation efforts. The updated state hazard mitigation plan should describe progress in changing these policies, laws or regulations. It should also note where there are chances to integrate with other plans and programs.

The plan update process is a chance to build on the previous capability assessment. To do this, the state capability assessment should have a general summary of obstacles and challenges encountered during the previous plan cycle. It should also include how the state capabilities have changed since the last plan's approval. The state should use the update process to find ways it can overcome these obstacles. It should also address any conflicts outlined in the state hazard mitigation plan.

### Using the Program Consultation to Strengthen Mitigation Capabilities

The [State Mitigation Program Consultation](#) is a yearly collaborative meeting. This meeting informs updates to the state capability assessment. After each year's consultation, FEMA shares a summary of the meeting. This summary describes the mitigation program strengths, specific challenges to advancing mitigation and chances to grow mitigation capabilities. The state planning team should review these summaries. It should also incorporate comments and highlights about the state's mitigation capabilities into the updated mitigation plan.

## 6. Resources

The following set of resources can help update the state mitigation strategy. Visit FEMA's [Hazard Mitigation Planning webpage](#) for more resources.

### 6.1. General Resources

#### [Hazard Mitigation Assistance Guidance and Addendum](#)

These two documents share the criteria of the three Hazard Mitigation Assistance (HMA) programs: HMGP, PDM and FMA. Visit the [Hazard Mitigation Assistance website](#) for more information on these and other HMA programs such as BRIC, HMGP Post Fire and STORM.

#### [Increasing Resilience Using THIRA/SPR and Mitigation Planning](#)

This job aid document outlines the similarities and differences between mitigation planning, the THIRA and the SPR process. It also shares ways to manage state, territory and tribal submissions of these elements.

#### [Comprehensive Planning Guidance \(CPG\) 201, Third Edition](#)

This document provides guidance on how to complete the THIRA and SPR processes, It is a source of risk assessment information and a complementary capability assessment to the hazard mitigation planning process.

#### [National Mitigation Framework](#)

This document provides context for how the whole community works together. It also shares how mitigation efforts relate to other parts of national preparedness. It covers the seven core capabilities needed to reduce the loss of life and property. It may help states frame their own capability assessments for state mitigation plans.

#### [National Risk and Capability Assessment](#)

This is a toolkit of products that can help states measure risks, capabilities and gaps in a standardized and coordinated way. It includes THIRA and the SPR.

#### [State Hazard Mitigation Plans](#)

It may be helpful to look at other state mitigation plans for ideas on organization. It can also help to look at the depth and breadth of capabilities that exist in other locations. Visit FEMA's [directory of State Hazard Mitigation Officers](#) to get the contact information of each state's emergency management agency. FEMA also links to all available state plans in its [Plan Status web map](#).

### [Silver Jackets Program](#)

This interagency flood risk management initiative enlists teams in states across the country to apply shared knowledge to response, recovery and mitigation initiatives that will reduce flood loss.

## **6.2. Equity Resources**

### [Addressing Social Equity Through Natural Hazards Mitigation Planning](#)

This is a training from FEMA Region 10. It gives ways to address equity issues when developing and carrying out a community's natural hazard mitigation plan.

### [Building Alliances for Equitable Resilience](#)

This document from the Resilient Nation Partnership Network provides guidelines for how to break down barriers and embrace diverse perspectives to achieve whole-community resilience.

### [Environmental Justice Guidance](#)

This Government Accountability Office document has information about federal efforts that relate to better planning and coordination with regards to environmental justice.

### [Guide to Expanding Mitigation: Making the Connection to Equity](#)

This document is one of FEMA's Guides to Expanding Mitigation. It helps mitigation planning partners learn more about equitable mitigation. It also helps them learn how it can be used within communities and plans. The guide defines social vulnerability and the differences between equity and equality.

### [Guide to Expanding Mitigation: Making the Connection to Older Adults](#)

This document was developed by FEMA and the American Association of Retired Persons (AARP). It highlights how including older adults in mitigation planning efforts can create a more comprehensive mitigation strategy that serves the whole community. As a group, older adults often suffer the highest number of fatalities during disaster events. Prioritizing their needs before and after disasters can help to mitigate that risk.

### [Guide to Expanding Mitigation: Making the Connection to People with Disabilities](#)

This resource is part of the FEMA Guide to Expanding Mitigation Series. It outlines how to include people with disabilities not only in disaster preparedness and response, but also in long-term risk reduction efforts.

**[In the Eye of the Storm: A People’s Guide to Transforming Crisis & Advancing Equity in the Disaster Continuum](#)**

This NAACP-created document provides six suggestions that help communities build equity into emergency management.

**[Planning for Equity Policy Guide](#)**

The American Planning Association made this guide. It outlines best practices for incorporating the principles of equity, inclusion, diversity and justice into planning processes and policies.