



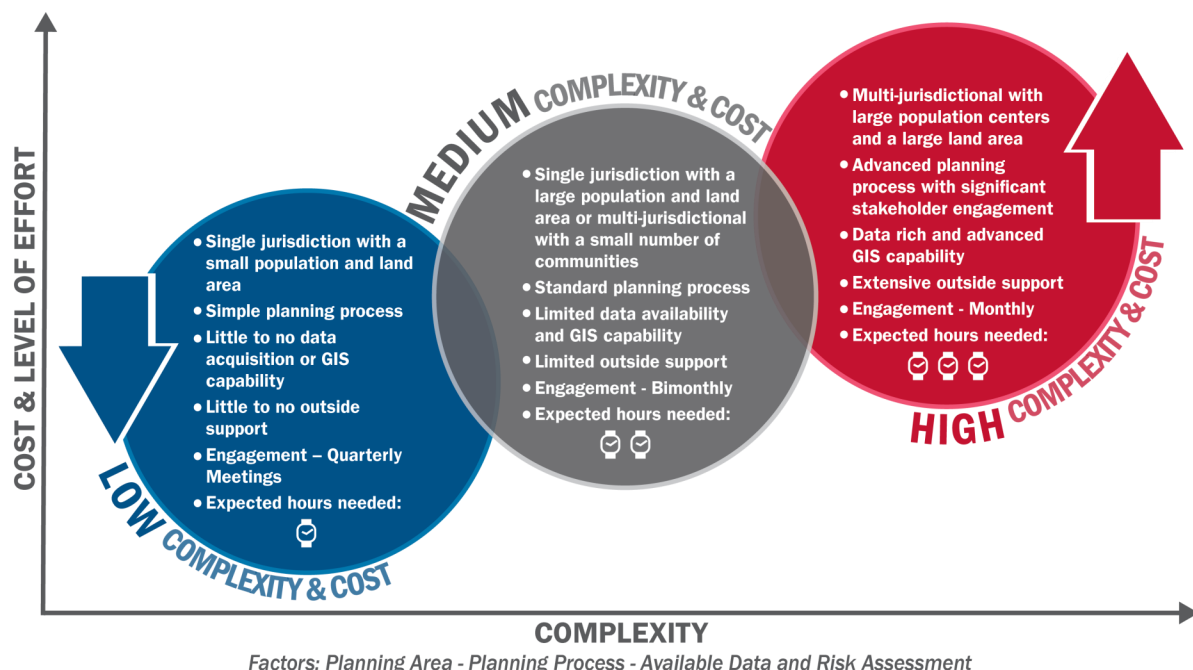
CONSIDERATIONS FOR LOCAL MITIGATION PLANNING GRANT SUBAPPLICATIONS

Developing a local hazard mitigation plan can help your community reduce the loss of life and property by lessening the impact of hazards. Having a FEMA-approved hazard mitigation plan is also required for communities (subapplicants) interested in receiving grant funding from FEMA for eligible mitigation projects. FEMA's [Hazard Mitigation Assistance \(HMA\)](#) provides planning grants to communities looking to develop or update their hazard mitigation plans. The purpose of this job aid is to provide considerations for the development of a planning grant scope of work with the ultimate goal of encouraging strong, comprehensive planning grant subapplications. It will help you think critically about what is needed for your hazard mitigation plan, and will help you understand the level of effort and cost implications of those needs.

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

Mitigation Planning Regulations and HMA Grant Guidance

The guidance provided in this job aid is consistent with the requirements for local hazard mitigation plans in Section 322 of the Stafford Act (42 U.S.C. 5165), Title 44 of the Code of Federal Regulations (CFR) §79.6(c)(1), 201.6, and 201.7 for tribal plans. Mitigation planning guidance is available from the [FEMA Mitigation Planning website](#). The most recent HMA guidance is available on the [HMA website](#).



PREPARING A STRONG HMA LOCAL PLANNING SUBAPPLICATION

Previous Planning Efforts

When you begin to put together a planning grant subapplication, it is important to start by evaluating your previous planning efforts, regardless of whether they were associated with a FEMA-approved mitigation plan. The planning narrative must include a description of previous mitigation planning efforts, including an evaluation of any past mitigation plans and mitigation efforts. Reviewing these previous planning efforts can help establish or update mitigation planning priorities, needs, and gaps.

Here are some key questions you should consider as you and your team develop this planning narrative, along with the implications of your answers:

Are you completing a plan update?

- If this is a plan update, review the previous plan's [Plan Review Tool](#), especially the Plan Assessment section. The Plan Review Tool demonstrates how a mitigation plan meets the regulations and offers States and FEMA an opportunity to provide feedback. In particular, the Plan Assessment section lays out ways to improve your plan. Your planning narrative should identify which of the Plan Assessment improvements you intend to include in the update, and factor in the costs and level of effort needed to support these improvements.
- If this is a plan update, the planning narrative should indicate if mitigation priorities have changed since the last plan. Sometimes a major disaster in a community can change what is important to update or include in a plan. Recent changes in development can also affect priorities.

Has your community completed any mitigation planning-type activities through FEMA or other programs?

- If your community is participating or has participated in the Risk Mapping, Assessment, and Planning (Risk MAP) process recently, your planning narrative should discuss how you plan to incorporate the results of Risk MAP into your mitigation planning process. This may mean including the participants of the Risk MAP process, incorporating Risk MAP data, or aligning the processes. Piggybacking on the Risk MAP process may help you leverage additional resources available through the mapping process. (For more information, visit the [Risk MAP](#) website.)
- Your community may be working to reduce its risk to natural hazards through other plans and processes. If your community has identified hazards, evaluated capabilities, or developed risk reduction projects for another planning process (land use plans, master plans, open space plans, etc.), your planning narrative should document the connection between the planning grant and these other planning efforts. Aligning mitigation efforts, regardless of the program sponsoring the work, can decrease costs over time because the information may be readily available in another document and eventually integrated into the hazard mitigation plan.

Planning Area & Planning Process

The planning area and planning process will typically drive the development of a local mitigation plan, and there are usually positive relationships between the size of the planning area, the complexity of the planning process, and costs. The planning narrative must describe the geographic area your plan will cover. A summary description of the planning area's demographics, while not required, can provide overall context and more effectively assess the risk by highlighting which populations might be more or less at risk to certain kinds of hazard events. Generally, mitigation planning areas follow the boundaries of local government jurisdictions, such as cities, townships, counties, or planning districts. However, planning areas may also be defined by watersheds or other natural features. A jurisdiction's boundaries may also cross over or encompass other jurisdictions, such as a fire protection district or a utility district.

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

Here are some key questions you should consider as you and your team develop this planning narrative, along with the implications of your answers:

How many jurisdictions are participating in the planning process?

- A larger number of participating jurisdictions will generally increase complexity and cost because each jurisdiction must be engaged in the planning process and given the chance to provide input to the plan's content. Smaller, more compact jurisdictions may need a less intensive planning process. Identify the number of jurisdictions included in the plan in your planning narrative.
- If you plan to meet with or engage your participating jurisdictions separately or in small groups, it will take more time and effort to execute, but it may be a worthwhile endeavor to build support for mitigation in your community. Describe the methods you propose to engage each participating jurisdiction in the planning narrative.
- Consider whether your local plan will include any special interest groups or native tribes. If the plan will include either one of these groups, the level of effort may be higher because they may need special attention when identifying roles and responsibilities. Tribal governments are also subject to tribal-specific planning requirements; your planning narrative should reflect the additional work that may be needed to meet the tribal planning regulations.

TASK 1	Determine the Planning Area and Resources
TASK 2	Build the Planning Team
TASK 3	Create an Outreach Strategy
TASK 4	Review Community Capabilities
TASK 5	Conduct a Risk Assessment
TASK 6	Develop a Mitigation Strategy
TASK 7	Keep the Plan Current
TASK 8	Review and Adopt the Plan
TASK 9	Create a Safe and Resilient Community

Typical tasks in the mitigation planning process as described in the [Local Mitigation Planning Handbook](#)

All local and tribal hazard mitigation plans must provide the opportunity for the public and stakeholders to be involved in the planning process, but you get to determine what those opportunities look like. *What do you plan to do to engage the public and stakeholders?*

- Consider how many meetings and/or workshops you plan on having as a part of the planning process, the meeting type(s), and the location(s). Generally, the more meetings you have, the higher the level of effort. In-person meetings can be more labor-intensive than web-based ones, and travel time and costs can affect how much funding you need for your engagement process. Explain in your planning narrative what you plan to do and how the planning process will benefit.
- If you plan to conduct a public survey, your subapplication should describe the intent and value of the survey, how the results will be used, and who the target audience is. Document the method of the survey (paper or online) and what costs might be associated with it in the planning narrative.
- Make sure you are accounting for the time and effort it may take to incorporate public and stakeholder feedback into the plan when developing your schedule and cost estimates.

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Local jurisdictions may choose to engage an external contractor to assist with the hazard mitigation plan, but they do not have to. *How do you plan to use external contractor support?*

- Provide a detailed description of what items of the hazard mitigation plan the contractor will be responsible for and tie items to the budget, work schedule, and scope.
- Include as an attachment to the subapplication an itemized cost estimate that is reasonable, is cost beneficial, and corresponds to the grant schedule. This cost estimate can come from the contractor, or it can be an independent estimate prepared by the local jurisdiction or tribe.

Available Data & Risk Assessment

The risk assessment is an expensive and often complex part of the planning process. The risk assessment narrative must describe the methods and resources that the planning team will utilize to research, collect, analyze, and summarize information on hazards and associated risks. The plan must include a description of the natural hazards that can affect the planning area. Manmade hazards may be included in the plan, but they are not required and will not be reviewed to meet plan requirements. See *Integrating Manmade Hazards into Mitigation Planning* ([FEMA 386-7](#)) for suggestions and information on including these types of hazards in the mitigation plan.

Here are some key questions you should consider as you and your team develop this planning narrative, along with the implications of your answers:

How many hazards do you expect to include in your hazard mitigation plan?

- Developing hazard profiles can be time- and data-intensive. Including a higher number of natural hazards will usually increase the cost of developing your mitigation plan and can add time to the schedule. Document in your risk assessment the number of natural hazards you expect to profile and scale your cost estimate and schedule appropriately.
- If you are completing a plan update, document in your risk assessment narrative what data gaps and deficiencies you are looking to fill in the updated risk assessment. You do not have to completely rewrite each hazard profile as you update your plan. Instead, use this section as an opportunity to describe what you propose to improve upon in the risk assessment, as this will drive the costs.

Will new data or maps be generated for the hazard mitigation plan?

- Developing new data can be expensive and labor-intensive, but it is something FEMA will fund. If you plan to generate new data, explain the use of the new data as well as the value the new data will add to the plan. Explain how the new data will build a better risk assessment and mitigation strategy, and describe where the source data will come from (including Federal and non-Federal sources) and how it will be processed.
- Using GIS to map critical facilities and hazard locations can provide valuable analysis, as well as visually communicate the plan's key concepts, but it can be resource intensive. Explain any GIS mapping and analysis needs for the plan.
- Using your State mitigation plan to support the risk assessment can lower costs because you may not have to acquire or analyze the data yourself. If you will rely on State plan data, explain why in the risk assessment narrative.

Will a specific risk assessment methodology or software be used?

- There are times when a specific risk assessment methodology or software is appropriate to use in a plan update. The risk assessment narrative should describe the specialized methodology and its impact on the plan itself, and costs should be appropriately matched to the tools you intend to use.

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- If you intend to use [Hazus](#) or other GIS software to support assessing vulnerability, the level of customization of the analysis will drive the costs. In Hazus, basic analyses using the default data will cost less than enhanced analyses that require data acquisition, formatting, and analysis. The use of Hazus is not required, but it can have major implications on cost. For example, developing site-specific loss estimates can be labor-intensive but may be valuable to build the case for mitigation in an area that repeatedly floods.
- For plan updates, you are strongly encouraged to go beyond the previous planning efforts and refine the data and methods used to understand potential losses. This can mean completing a more refined Hazus analysis, sometimes called a Level 2 or Level 3. If you intend to complete a Level 2 or 3 Hazus analysis, your risk assessment narrative should explain which data you plan to enhance and describe how this enhanced analysis will add value to the plan.



Development of the Mitigation Strategy

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

Here are some additional questions you should ask yourself as you develop the SOW and cost estimate:

Do you have an existing mitigation strategy?

- Explain in your SOW how you intend to gather information on the status of previous mitigation actions and allow for the cost to do so. If your plan is an update, you must provide a status report on all the previously prioritized mitigation actions. Further, your plan will include an evaluation and prioritization of new mitigation actions identified since the previous plan was approved. This information can take time to track down, especially if there has been staff turnover.

How complex is your local planning framework?

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

Plan Adoption

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

How soon will your plan expire?

- If you are applying for a grant to complete a plan update, it is important to keep your local plan expiration date in mind. You may need to compress the plan drafting and the adoption/approval schedule; this does not necessarily increase costs, but it can increase how many resources are needed in a short time period. This should be documented in your planning grant schedule. It is important to understand the application approval process so you have enough time before your plan expires.
- Your grant schedule should account for any changes that might occur during the review and adoption by your local governing body. If the plan is changed during this time, it will have to be resubmitted for State and FEMA review.

How will the plan be adopted?

- Jurisdictions have their own policies and procedures for adopting the local mitigation plan. Document in your planning grant schedule if/how the method of adoption will affect the schedule. The frequency with which the adopting body meets can drive how long it may take for the plan to be adopted and for the adoption resolution to be sent to the State and FEMA for final approval.

CONSIDERATIONS FOR COST ESTIMATES

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

Consider the following when developing your planning grant subapplicant cost estimate:

What are the main items that should be considered when developing a budget?

- Preparing a cost estimate is a key function for developing a successful plan. A good cost estimate will help you manage your entire planning process. You will want to make sure you have adequate resources to complete and adopt the mitigation plan. Many times, cost estimates are developed based on the phases of the planning process.
- The cost estimate should account for the entire performance period for the production of the plan and include sufficient time for State and FEMA review, potential revisions, and local plan adoption. The period of performance cannot exceed three years, including grants management activities required for closing out the subaward.
- The cost estimate can include costs for the planning team to travel to and attend [applicable training](#).
- It is recommended that the planning team convene to develop the planning grant application together. This is an eligible pre-award cost that can be included in the cost estimate.
- As part of the planning process, the draft plan must be submitted for public comment and approval by the local governing body. The cost for the production and distribution of publications associated with the plan should be included in the cost estimate. Public outreach and stakeholder coordination efforts should be accounted for in the cost estimate. Outreach methods will vary in cost by the amount and level of effort conducted by the subapplicants.

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- The cost estimate should account for any special studies or additional funds needed to support an enhanced analysis that will be included as part of the plan. The cost estimate should also account for any new hazards that have been identified and will be considered as part of a plan update.
- Identify all in-kind staff time, including costs, incurred to support plan coordination and outreach. In-kind costs can be applied to meet the non-Federal grant match, which is up to 25 percent of the total cost of the plan.
- Management costs are indirect costs and administrative expenses anticipated during plan development. The amounts, allowable uses, and procedures to request management cost funding vary by program and are found in the [HMA Guidance \(2015\)](#).

If you plan to hire a contractor, what cost items should be considered in the budget?

- Supportive documentation, such as contractor estimates, should demonstrate a clear understanding of the SOW, limitations, and final outcomes of the plan. If the estimate is based on carefully thought-out assumptions, it will have factored in many of the changes that come after the grant is awarded.

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

MITIGATION PLAN REQUIREMENT TO RECEIVE HMA MITIGATION PROJECT FUNDING

As stated on the first page of this job aid, a FEMA-approved mitigation plan is required for subapplicants interested in receiving HMA funding for mitigation projects. Information on the mitigation plan requirement can be found on FEMA's [Hazard Mitigation Plan Requirement](#) website. However, under limited circumstances, applicants (states), on behalf of a subapplicant, may request an exception to the mitigation plan requirement in order to receive a mitigation project grant. As a condition of the award, the subrecipient must have a FEMA-approved mitigation plan within 12 months of the mitigation project subaward. Details about this option can be found in the HMA Guidance (2015).

Resources and Additional Information

HMA: [HMA](#) provides information on grant policy and resources that can assist with the development of planning grant applications. See the [Application Development](#) page. The most recent [HMA program guidance](#) is available in the FEMA Library.

Hazard Mitigation Planning: Additional details about hazard mitigation planning are available from the [Hazard Mitigation Planning website](#). Further information on local planning requirements, approaches, and examples is available in the [Local Mitigation Plan Review Guide](#) and [Local Mitigation Planning Handbook](#).

NFIP: Visit the [NFIP website](#) to view a variety of resources related to flood insurance, flood mapping, and flood mitigation. Further information on the requirements related to CRS is available from the [National Flood Insurance Program Community Rating System website](#).