

SECTION 4: LOCAL MITIGATION PROGRAM COORDINATION

4.1 LOCAL CAPABILITY ASSESSMENT

OVERVIEW

The preparation of Local Hazard Mitigation Plans (LHMPs) is a precondition for receipt of Hazard Mitigation Grant Project funds under the Disaster Mitigation Act of 2000 (DMA 2000) which also requires that states examine LHMPs as part of their SHMP process. FEMA has established mitigation planning requirements for local jurisdictions to meet, among other things, to demonstrate that proposed mitigation actions are based on a sound planning process that accounts for the inherent risk and capabilities of the individual communities.

The Ohio EMA Mitigation Branch administers the LHMP Program for the state. The Mitigation Branch supports and assists local governments in the development and update of LHMPs. In 2002 and 2003, significant amount of federal and state PDM funds were provided to develop LHMPs. For the time period spanning from the 2005 plan to the 2008 update, the main planning emphasis of the Mitigation Branch has been to get LHMPs reviewed, adopted, and FEMA approved. From 2008 to 2011, the emphasis will shift to tracking LHMP progress and effectiveness in a more quantitative way, and integrating plan information more significantly into the state plan. Another goal of the Mitigation Branch is for all local governments in Ohio to have FEMA-approved LHMPs. Currently, Ohio has a very good LHMP participation rate. Based on a November 2007 report from FEMA Region V:

- **76.4%** of the population of Ohio was situated in a community with a locally adopted, FEMA approved plan.
- **20.1%** of the population of Ohio was situated in a community with a plan that has been developed, met FEMA requirements for LHMPs, but had not yet been locally adopted.
- **3.5%** of the population of Ohio was situated in a community with no plan or a plan in progress that has neither been reviewed by FEMA nor adopted.

Based on data as of May 2008, 82 of 88 counties have multi-jurisdiction plans are either adopted and FEMA approved or certified that they meet FEMA planning requirements (but not adopted), and the remaining 6 counties are in the process of developing a plan. This is a significant increase from 2005 where only 17 plans had been “certified” which means at that time the state had been given authority to approve the plans on behalf of FEMA (see the more in-depth discussion of certification in the 2005 plan). A county-by-county plan status report is included in Appendix D.

In the 2008 SHMP update, the Mitigation Branch undertook a cursory evaluation of all FEMA-approved LHMPs to identify trends and issues. For the next state plan update, the mitigation branch hopes to conduct a much more in-depth review of LHMPs and conduct a survey of local “plan keepers” (the folks who, according to Mitigation Branch records, are the local point of contact for the plan)

to identify the challenges faced by communities in developing, maintaining, and implementing the LHMPs.

AUTHORITIES RELATED TO HAZARD MITIGATION

Local authority to implement a comprehensive hazard mitigation program is ample. Ultimately, it is up to each local jurisdiction to determine which mix of authorities, programs, policies, and capabilities it wants to develop. All Ohio communities (cities, villages, and counties) have the power to develop and adopt many different kinds of plans including comprehensive plans, capital improvement plans, economic development plans, emergency operations/response plans, continuity of operations plans, and hazard mitigation plans to name a few. Communities have regulatory powers to adopt zoning, subdivision, building and development, floodplain management and health codes. Ohio communities have the power to levee taxes / assessments for special purposes (including petition ditch projects, stormwater utilities) and have the authority to borrow funds (bonding). Finally, communities have the authority to create planning, emergency management, health, public works, economic development and other needed agencies. All of these authorities have, or potentially could have, a bearing on local hazard mitigation.

QUALITATIVE ANALYSIS OF LHMPs

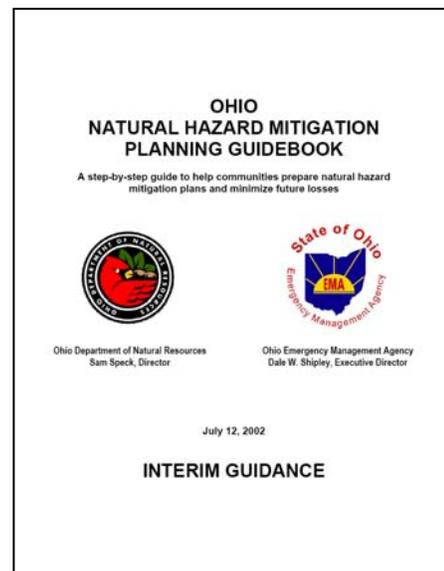
Because the Mitigation Branch has reviewed each LHMP, some trends were clearly evident. Again, these trends are based in a qualitative, not quantitative review of the LHMPs.

Overall Plan Quality

Overall, LHMPs involved many local agencies/entities and are of a good quality. It was noted that the quality of the plan is not dependent on its size; rather, it is the format and quality of information in the plan that is more important. Some of the best LHMPs are small to moderate sized.

Many LHMPs utilized FEMA's planning how-to publications; however, even more utilized the Ohio Natural Hazard Planning Guidebook. The handbook was written to be one volume with the intent to create a basic LHMP. In reality, Mitigation Branch staff advised LHMP plan keepers to use both resources.

Definitions used in the LHMPs were not consistent. The areas where inconsistencies were most evident was in defining critical facilities, identifying what constitutes a mitigation action, and defining hazards to which a community was susceptible.



The way LHMPs conducted risk assessments and ranked hazards to which communities are susceptible was extremely variable. Variability in the risk assessment process and data sources used is not surprising given that communities have significantly different amounts and quality of data. In terms of ranking hazards, some LHMPs did rank the hazards based on a numerical ranking (using a matrix or scoring system), some developed a relative ranking system (one hazard ranked higher than another but no number identified), and some developed a qualitative ranking system (ranking hazards as high, medium or low threat). However, flooding, severe summer storms, high winds/tornadoes, and severe winter storms were consistently ranked high or severe.

Single community LHMPs tended to be much more focused than did multi-jurisdictional mitigation plans. Although the overwhelming majority of mitigation plans in Ohio are multi-jurisdictional (90%+), some jurisdictions felt that a stand-alone plan would be more meaningful. While we do not have data to determine whether this is true, the stand-alone plans were much more focused on specific issues.

Mitigation Policies, Programs & Capabilities

Local mitigation policies and programs can be best understood by reviewing the local mitigation strategies. Those strategies should indicate whether policies or programs exist and need to be modified, or whether they exist at all. A few trends were noted.

It was evident that larger communities and counties have more extensive policies and programs in place vs. smaller communities. Many of the local strategies pertaining to larger local governments tended to be geared towards refining or enhancing existing policies and programs vs. creating them. The reverse was seen with smaller units of government.

A similar trend was seen with local mitigation capability. Participants in the planning process for larger communities tended to be professional staff positions and/or multiple persons, while participants for smaller communities ranged from the mayor to council members, to an appointed citizen.

Mitigation policies/programs/capabilities varied significantly from community to community and county to county. Some communities and counties had very sophisticated mitigation programs either demonstrated by the sophistication of their mitigation plans/goals/actions or the integration of mitigation programs. In addition, some communities developed their own, stand-alone plans. On the other end of the spectrum were communities that have virtually no involvement in hazard mitigation.

Mitigation Actions

Mitigation actions identified in LHMPs were heavily influenced by whomever was leading the planning effort. For example, a LHMP developed in-house by a county emergency management agency had a tendency to focus on mitigation actions that were emergency management related. Similarly, LHMPs developed

by a county planning agency tended to have a focus on land use management measures.

It was evident that there was some confusion as to what constituted a mitigation goal/objective/action. Many actions in LHMPs were either preparedness or response actions. There is one LHMP where nearly every action is not related to hazard mitigation.

Education and outreach actions were the most numerous identified in LHMPs. Other actions that were frequently mentioned included flood mitigation projects (acquisitions, stream clearing/dredging), development of emergency action plans downstream of high hazard dams, shelter creation/development, upgrade regulations (building code, floodplain management regulations, zoning), and warning systems (flood/wind).

4.2 LOCAL MITIGATION PLANNING ASSISTANCE

The 44 CFR 201.4 (c)(4)(i) requirement maintains the state should include a description of the process to support, through funding and technical assistance, the development of LHMPs.

Hazard mitigation planning is a way, in a non-disaster environment, to understand hazards and prepare strategies and actions to reduce the impact of these hazards. The ever-rising recovery costs of disasters plaguing Ohio made it apparent that a pre-disaster planning and project focus with ongoing risk analysis could reduce these costs. The State of Ohio utilizes any available Federal program funds for mitigation projects and has documented success stories proving the necessity and effectiveness of the programs. The DMA 2000 stipulates that state and local jurisdictions need to have an approved LHMP to remain eligible for any Federal funding for mitigation projects. Ohio has taken a very proactive role in the involvement with local jurisdictions to secure the availability of the funding programs and assist local communities in developing LHMPs in the past six years (2002-2008). This effort has resulted in a very large number of communities having developed and adopted LHMPs.

INITIAL STATE EFFORTS

LHMP creation has been a primary goal of the Mitigation Branch for several years. From 2002-2006, Ohio EMA distributed PDM and HMGP funds to any jurisdiction with the ability and willingness to complete a LHMP. The Ohio EMA Mitigation Branch staff is responsible for interaction with counties, cities and villages working on LHMPs. An explanation of the initial planning requirements and recommendations on the usage of planning funds was achieved through planning meetings. As the planning process evolved, so did the involvement of the state. The availability of a technical assistance consultation throughout the process and a final review of the draft plan provide communities with several opportunities to produce an approvable plan.

When the plan requirements were initially distributed, local jurisdictions were unsure about the creation and significance of the plan. Communities applied for state funds to assist with the planning process. The State of Ohio committed to the effort of LHMP creation by matching 2002 and 2003 PDM planning funds dollar for dollar. Ohio EMA Mitigation staff met individually with all recipients of PDM 2002 funds for planning. All recipients of PDM 2003 funds were invited to one of four regional meetings for assistance with their plans. Any jurisdictions requesting funds for planning, after the all the PDM funds were allocated, were funded through HMGP. The state offered guidance for those recipients at a meeting in the state office.

The meetings provided an opportunity for Ohio EMA staff to verbalize their expectations for the communities to create an approvable plan. Ohio, as a Managing State, was able to pre-approve the plans before they were sent to FEMA. All the plans had to meet the standard planning requirements, but the pre-approval allowed Ohio flexibility. Ohio EMA was aware of the resources

available to communities and expected more from urban areas versus limited less developed jurisdictions. Each jurisdiction received several technical assistance tools at the planning briefing to assist with the process. The Mitigation Branch staff who conducted the meeting distributed and explained the relevance of each document.

The informational packet included:

- A copy of the Law listing the requirements for the LHMP
- An outline of Ohio EMA expectations and additional planning resources
- FEMA publications 386-1 thru 386-4, part of the Getting Started Series
- FEMA's DMA 2000 Mitigation Plan Guidance
- Ohio's Mitigation Planning Guidance
- An extensive list of contractors who have assisted other communities with Plans
- A copy of the crosswalk that outlines the requirements and method for assessment of the plan

Ohio utilized and distributed FEMA documents to assist communities with their LHMPs. In addition, the Ohio Natural Hazard Mitigation Planning Guidebook was provided. The Guidebook outlined requirements relevant to Ohio communities and explained a simple, easy to use, planning process.

From 2002-2006 the Appalachian Flood Risk Reduction Initiative resulted in the completion of many plans. Of note, the AFRRRI was not funded by FEMA; rather, it was jointly funded by the United States Economic Development Administration and the Ohio Department of Natural Resources.

Whether through the initial 2002-03 PDM planning effort, HMGP funding for LHMP planning, or AFRRRI, the state staff also provided technical assistance with LHMP development. Staff at the ODNR-DOW, Floodplain Management Program and Ohio EMA Mitigation Branch have provided hands-on technical assistance with plan development. State staff provides reviews for LHMPs, facilitate planning meetings, assist with technical data acquisition/development, provide information on mitigation options, and assist in locating funding sources.

CURRENT STATE EFFORTS

LHMPs are now a prerequisite to obtaining funds from any FEMA mitigation programs (except RFC). In addition, new requirements published by FEMA on October 31, 2007 will require all updated plans meet FMA planning requirements (additional flood hazard mitigation strategy and strategy for repetitive loss programs). To keep abreast of and implement these changes, the Mitigation Branch will continue to prioritize the planning element of the state mitigation program.

Technical Assistance

Technical assistance that the state can provide communities includes:

- Mitigation planning process assistance including facilitating planning meetings, providing guidance documents for plan creation/update, etc.
- HIRA data development. The Ohio EMA Mitigation Branch and the ODNR-DOW, Floodplain Management Program both have competencies in running FEMA's HAZUS-MH program. Staff can provide assistance and training in HAZUS-MH and conduct HAZUS runs that can be provided to communities. In addition, state staff can provide other data that communities may not have (other flood studies, underground mine maps, etc). State staff, with the assistance of Federal agency partners, often develops data after disasters.
- Information on mitigation actions including manuals, reference documents and other resources on different mitigation actions for all hazards.
- Mitigation action budget information. Since state staff is often involved in implementing mitigation projects statewide, staff has a good understanding of current costs of mitigation actions.
- Reviewing draft LHMPs for compliance with FEMA criteria. A jurisdiction sends their final drafts to OHIO EMA for approval. A reviewer in the Mitigation Branch uses the crosswalk provided by FEMA to evaluate the plan according to the requirements. If the plan meets all the requirements, the crosswalk and draft plan are forwarded to FEMA for approval. If a plan does not meet the requirements, the Mitigation Branch staff follows up with the submitter to revise and resubmit the draft.

Financial Assistance

In 44 CFR201.4(c)(3)(iv) the state is required to include identification of current and potential sources of Federal, state, local or private funding to implement LHMP mitigation actions and to undertake mitigation planning.

It is important not only to provide financial assistance whenever possible, but also to identify sources of funding that can fund hazard mitigation planning and action item implementation (projects). LHMPs, if properly created, should not only identify mitigation actions that can be funded by FEMA, but other agencies as well. The following table identifies several potential funding sources for hazard mitigation projects.

The State of Ohio currently has limited financial resources dedicated toward funding of mitigation related projects – both planning and otherwise. In the past three years, HMGP and state funds have been used to ensure that the remaining counties that had not yet undertaken mitigation planning had the opportunity to do so. As of May 2008, all 88 Ohio counties either have a FEMA approved plan or are undertaking mitigation planning.

The primary sources for state and local hazard mitigation projects have been the federally funded cost-share programs. The state matches a portion of FEMA hazard mitigation grant programs (primarily HMGP) through the state's disaster relief fund and has contributed over \$36 million for hazard mitigation activities since 1990. As a general policy, the state requires local jurisdictions to contribute at least some non-Federal matching funds and is a requirement for project prioritization by the SHMT.

The limited funding from local community budgets requires the use of alternate funding sources for the cost-share match. Different state agencies distribute funds that can be used for mitigation activities. This section examines the Federal, state, local, and private sources available to provide financial assistance to local communities to implement hazard mitigation projects.

**Table 4.2.a
Potential Hazard Mitigation Funding Sources**

Program	Administered By?	Federal / State / Local Source?	Purpose / Contact	Used Before?
Hazard Mitigation Grant Program (HMGP)	Ohio EMA Mitigation Branch	Federal - FEMA	Provides funds after Federally declared disaster to implement certain hazard mitigation projects (includes mitigation planning grants). Can be used for any hazard, subject to state Administrative Plan and Mitigation Strategy. Commonly used to acquire/demolish, elevate, retrofit, buildings; construction of tornado/high wind safe rooms, stormwater management system improvements, etc. http://www.ema.ohio.gov/mitigation.asp	Yes, extensively. Largest mitigation program used in Ohio – over \$112 million Fed/state/local funds since 1990.
Pre-Disaster Mitigation Grant Program (PDM)	Ohio EMA Mitigation Branch	Federal – FEMA	Provides funds annually based on Congressional appropriations to implement certain hazard mitigation projects (includes mitigation planning grants). Can be used for any hazard. Nationally competitive. Commonly used for activities similar to HMGP. http://www.ema.ohio.gov/mitigation.asp	Yes, increasingly used. Over \$8 million Fed/state/local funds since 2002.
Flood Mitigation Assistance Program (FMA)	Ohio EMA Mitigation Branch	Federal – FEMA	Provides funds annually based on Congressionally appropriations to implement certain flood hazard mitigation projects (includes flood mitigation planning grants). Each state receives an allocation of funds. Commonly used for flood mitigation activities similar to HMGP. http://www.ema.ohio.gov/mitigation.asp	Yes – FMA funds available since 1988. Ohio receives allocation of between \$200,000 and \$300,000 per year. Usually funds 1-2 projects from communities.

Program	Administered By?	Federal / State / Local Source?	Purpose / Contact	Used Before?
Repetitive Flood Claims Program (RFC)	Ohio EMA Mitigation Branch	Federal – FEMA	<p>A nationally competitive grant, provides funds annually based on Congressionally appropriation to implement certain flood hazard mitigation projects (no planning grants). Commonly used for flood mitigation activities similar to HMGP.</p> <p>http://www.ema.ohio.gov/mitigation.asp</p>	Yes. Program new in 2007, two Ohio communities awarded projects.
State Match to HMGP and 406 Public Assistance Mitigation	Ohio EMA Mitigation Branch	State – Disaster Relief Fund	<p>A nationally competitive grant, provides funds annually based on Congressionally appropriation to implement certain flood hazard mitigation projects (no planning grants) for structures that meet the Federal definition of a “severe repetitive loss.” Commonly used for flood mitigation activities similar to HMGP, and includes the mitigation-reconstruction option.</p> <p>http://www.ema.ohio.gov/mitigation.asp</p>	Not yet. 2008 first year funds made available. Ohio has submitted one project for the national competition.
Community Development Block Grant (CDBG)	Ohio Department of Development - Office of Housing Community Partnerships	State	<p>The Community Development Program(s) provides funding to Ohio's non-entitlement counties and cities for housing rehabilitation, economic development and public works improvements that meet federal and state objectives to benefit low- and moderate-income persons and/or eliminate blighted areas. Also includes CHIP funds.</p> <p>http://www.odod.state.oh.us/CDD/OHCP/cdp.htm</p>	Yes, extensively. Has been one of the largest sources of matching funds for FEMA mitigation program projects. Must be used in projects where low to moderate income households are affected.

Program	Administered By?	Federal / State / Local Source?	Purpose / Contact	Used Before?
HUD Disaster Supplemental Funds	Ohio Department of Development	State or Federal depending on Congress		Yes, Used for five previous disasters. When funds are available, can be used to supplement FEMA funds that are available so more project can be funded.
Home and Business Physical Disaster Loans	Small Business Administration (SBA)	Federal	<p>Any business or non-profit organization that is located in a declared disaster area and has incurred damage during the disaster may apply for a loan to help repair or replace damaged property to its pre-disaster condition. The SBA makes physical disaster loans of up to \$1.5 million to qualified businesses. Physical Disaster Loans are for permanent rebuilding and replacement of uninsured or underinsured disaster- damaged privately-owned real and/or personal property. Physical disaster loans are also available to individuals and renters for permanent rebuilding and replacement of uninsured or underinsured disaster- damaged privately-owned real and/or personal property.</p> <p>To help disaster victims fund protective measures, home and business owners may request an increase of up to 20 percent of the total approved SBA loan amount to help pay for mitigation measures. Only available after a Federally declared disaster where there is an SBA declaration.</p> <p>http://www.sba.gov/services/disasterassistance/index.html</p>	Yes – although frequency unknown.

Program	Administered By?	Federal / State / Local Source?	Purpose / Contact	Used Before?
Section 406 Public Assistance Mitigation Funds	Ohio EMA Disaster Recovery Branch	Federal	The Robert T. Stafford Disaster Relief and Emergency Assistance Act provides FEMA the authority to fund the restoration of eligible facilities(public and certain non-profit) that have sustained damage due to a Presidentially declared disaster. Section 406 of the Stafford Act contains a provision for the consideration of funding additional mitigation measures (further described in 44 CFR §206.226) that will enhance a facility's ability to resist similar damage in future events	Frequently used in Ohio, the need and eligibility for 406 mitigation funds are done on a project-by-project basis, when projects are being evaluated by FEMA and the state for normal Public Assistance funding. 406 mitigation can pay to elevate public buildings, upsize damaged culverts, etc.
Clean Ohio Fund	ODNR	State	<p>The Clean Ohio Fund, created by House Bill 3 in November 2000, consists of four competitive funding programs.</p> <ul style="list-style-type: none"> • The Clean Ohio Green Space Conservation Program helps to fund preservation of open spaces, sensitive ecological areas, and stream corridors. • The Clean Ohio Agricultural Easement Purchase Program supports the permanent preservation of Ohio's most valuable farmland through the purchase of development rights. • The Clean Ohio Trails Fund works to improve outdoor recreational opportunities for Ohioans by funding trails for outdoor pursuits of all kinds. • The Clean Ohio Revitalization Fund supports the cleanup of polluted properties so that they can be restored to productive uses. 	All the funds from HB3 have been allocated. However, an additional \$400 million in funding has been proposed by Gov. Strickland and will, hopefully, be place as a bond issue on the November 4 th ballot.

Program	Administered By?	Federal / State / Local Source?	Purpose / Contact	Used Before?
Coastal Management Assistance Grant	ODNR – Office of Coastal Management	Federal	Every year, ODNR awards at least \$250,000 in Coastal Management Assistance Grants. Coastal Management Assistance Grants are funds awarded to help preserve, protect and enhance Ohio's Lake Erie coastal resources. Grants are awarded on a competitive basis, with applicants providing a minimum of 50 percent of the project costs.	Since the program began in 1997, 75 projects have been awarded more than \$2.6 million. For 2007, eight projects totaling \$530,962 were awarded Coastal Management Assistance Grants totaling \$250,000.
Planning Assistance to States (PAS)	USACE	Federal	<p>Section 22 of the Water Resources Development Act (WRDA) of 1974, as amended, provides authority for the Corps of Engineers to assist the states, local governments, and other non-Federal entities in the preparation of comprehensive plans for the development, utilization, and conservation of water and related land.</p> <p>The Planning Assistance to States (PAS) Program is funded annually by Congress. Federal allotments for each State or Tribe from the nation-wide appropriation are limited to \$500,000 annually, but typically are much less.</p> <p>These studies are cost shared on a 50 percent Federal-50 percent non-Federal basis.</p>	The PAS was used to conduct a Level 1 HAZUS-MH analysis for the HIRA section of the 2008 SHMP update. The study covered the 25-year and 100-year flood analysis for 49 of the 88 counties in Ohio.
Flood Control (Structural & Non-Structural)	USACE	Federal	<p>USACE, without specific authorization, may study, adopt, and construct small flood control projects, stream clearing and snagging projects, and participate in planning and preparedness.</p> <p>The cost share for Flood Control projects are 65 percent Federal-35 percent non-Federal</p>	

Program	Administered By?	Federal / State / Local Source?	Purpose / Contact	Used Before?
Emergency Streambank and Shore Protection	USACE	Federal	<p>Authorizes USACE to study, adopt, and construct emergency streambank and shoreline protection works to protect highways, bridges, public works, and nonprofit public services.</p> <p>The annual program limit for federal expenditures is \$15 million with not more than \$1 million expended per site.</p> <p>The cost share for Flood Control projects are 65 percent Federal-35 percent non-Federal</p>	

4.3 LOCAL MITIGATION PLAN INTEGRATION INTO STATE PLAN

The 44 CFR 201.4(c)(4)(ii) requires a description of the states process and timeframe by which the LHMPs will be reviewed, coordinated, and linked to the State Mitigation Plan.

LHMP REVIEW AND COORDINATION PROCESS

As mentioned in the previous section, the Ohio EMA Mitigation Branch reviews all LHMPs; however, FEMA is the final approval authority. The LHMPs will be logged into a queue upon arrival at the Ohio EMA. The State will review the draft to ensure compliance with the 44 CFR 201.6 local mitigation plan criteria within 45 days of the arrival. If the plan meets all FEMA requirements, it is forwarded to FEMA with a completed crosswalk for approval. Communication is provided to the community as to their status. Once the State has received approval of the document from FEMA, the State notifies the local jurisdiction in writing of the approval, when the update of the plan should be conducted, and the procedures that should be followed during the update process.

LHMP TRACKING

The State of Ohio has developed an Access database that identifies each LHMP that has been approved and catalogs all of the identified mitigation actions, the hazards each action addresses, and the estimated cost of said action. The state has input every action identified in all of the certified plans to this point. Because of the very heavy focus on plan development, this task has lagged. Currently, the database does not contain all plan items. However, an innovative new web portal will soon replace this simple system.

The web portal project, being funded by the PDM program and state funds, will result in better tracking and coordination of LHMPs. The enhanced plan certification is contingent on this project being successfully completed as its completion will keep Ohio in compliance with the enhanced plan criteria. A few features envisioned by the portal are:

- Quickly identify the top tier, or serious hazards by county
- Present local mitigation actions clearly and enable LHMP “plan keepers” to update this information by logging into the website
- Track past and ongoing mitigation projects
- Identify and present mitigation success stories including quantifying benefits of completed mitigation projects
- Catalog, store, and retrieve deeds for properties acquired using FEMA mitigation program funds
- Run reports to validate and update SHMP HIRA, strategy, goals, and objectives
- Present PDFs of LHMPs and the SHMP

The portal project received FEMA approval in April 2008 and is hoped to be completed in fall of 2008. Once the project is complete, and the database is fully updated, the update of the tracking database will occur when the draft LHMP is reviewed by Ohio EMA and forwarded to FEMA for final approval.

LINKING LHMPs TO THE SHMP

Because LHMPs are developed based on guidance and must meet specific Federal criteria, there are some similarities in their content. Nonetheless, LHMPs tend to be very different from one another in terms of: The quantity and quality of data presented in the HIRA; the techniques used to complete risk assessments and vulnerability analyses; the “structure” of goals, objectives, and action items; whether the action items are mitigation actions or not, and the relative ease of retrieving this information. For that reason, the Mitigation Branch has determined that the two most logical areas where the LHMP should link back to the state plan are in the HIRA and in the State Mitigation Strategy.

Link to HIRA. The LHMPs were reviewed and used to “ground truth” the data the state used to determine the most serious hazards facing the state. In Section 2, flooding, tornadoes, severe summer storms, and winter storms were identified among the most significant facing the state. These four were also the highest ranked hazards based on the number of plans reviewed indicating them as serious hazards. Coastal flooding, landslides, and invasive species are ranked high in the state plan; however, only some LHMPs identified these hazards as significant. This is likely due to a more limited geographical extent of such hazards.

Beyond the hazard identification, utilizing LHMP data (other than to “ground truth” state data) for risk assessment and vulnerability analyses is problematic. Since a LHMP does not contain data on a statewide basis, and since the methods used to conduct risk assessments and vulnerability analyses vary, it is impossible to utilize this data in the state plan to a great extent. It is utilized in the narrative descriptions of hazards, may confirm HIRA information, and may even be utilized in the risk assessment/vulnerability analysis for a hazard that has a limited geographical extent.

Conversely, analyses in the state plan HIRA may be useful and be incorporated into LHMPs. One of the tasks that the Mitigation Branch wishes to complete in the summer of 2008 is to provide applicable counties copies of HAZUS runs completed by the state.

Link to State Mitigation Strategy. Because the state mitigation strategy is a global view, objectives and actions may be of a different nature than those found in LHMPs. However, the goals in the state mitigation strategy should be reflective of and complimentary to LHMP goals. Again, LHMPs were reviewed and the goals in the state mitigation strategy are reflective of and encompass LHMP goals. LHMP goals/objectives/actions are useful to identify trends, needs, and do have a bearing in the development of state mitigation strategy goals and action items. For example, Goal 2, Objective 2 in the state mitigation strategy,

which is to develop web pages and information on mitigation for the business community, is proposed based on the large number of LHMPs that have identified this as an objective / action. Carrying out this action will not only have a positive impact on those counties with this identified in their LHMPs but statewide as well. To determine whether or not to roll a local objective / action into the state plan, it is evaluated to determine whether it has statewide applicability and whether it is a need expressed in a large number of LHMPs.

Linking and reviewing of the data in LHMPs will occur on an annual basis when the SHMP is reviewed. It is anticipated that the reports in the proposed web portal will assist in this effort.

4.4 PRIORITIZING LOCAL MITIGATION FUNDING ASSISTANCE

The 44 CFR 201.4 (c)(4)(iii) requires states to include criteria for prioritizing communities and local jurisdictions that would receive planning and project grants under available funding programs. The criteria should include consideration for communities with the highest risks, repetitive loss properties, and most intense development pressures. The plan also needs to include a principal criterion for non-planning grants based on the extent to which benefits are maximized according to a benefit cost review.

Demand for hazard mitigation funds almost always exceeds fund availability. For example in the past three Federal disaster declarations, available Federal mitigation funds have only met 15% of the demand.

Table 4.4.a

EVENT	HMGP FUNDS REQUESTED	HMGP FUNDS AVAILABLE (FED)	DIFFERENCE
DR-1651	\$15,191,356	\$1,798,019	-\$13,393,337 (-88%)
DR-1656	\$18,166,108	\$3,411,736	-\$14,754,372 (-81%)
DR-1720	\$44,888,432	\$6,630,799	-\$38,257,633 (-85%)

Therefore, it is important that the State of Ohio prioritize local mitigation funding assistance. Section 3.4 explained how Ohio has established both eligibility and prioritization criteria. Appendix G includes the worksheets the SHMT uses to rank project applications for funding. **The final project ranking by the SHMT is also the prioritization of eligible projects for funding.** The exceptions to this are under HMGP where 5% and 7% projects are funded outside of the SHMT ranking process. Projects submitted under these categories are funded in accordance with the specific priority outlined in the Administrative Plan and Mitigation Strategy for that particular event.

In the event that there is not enough funding for an eligible, high-ranking mitigation project, Mitigation Branch staff will work with the subapplicant to refine and submit in another grant funding cycle or program.

Although Federal planning guidance indicates criteria for local mitigation funding assistance should include consideration for communities with the highest risks, repetitive loss properties, communities with the most intense development pressures, and maximizing benefits based on a benefit-cost analysis; Ohio only considers repetitive loss and benefit-cost. For the nationally competitive grant

programs, state criteria match the national ranking and evaluation criteria exactly. Doing otherwise would put Ohio projects at a competitive disadvantage as compared to other projects that used the national criteria. For HMGP and FMA, repetitive loss is considered as is benefit-cost; however, communities with the highest risks and high development pressures are not. The reason for this is that it is assumed that almost all Ohio communities have high risk from the most serious hazards (flooding, tornado) and mitigation projects are used to remedy the “already built” environment, not the developing environment, that is much better handled through appropriate codes and land use measures.

One emerging issue is that of priority of funding updates to LHMPs. To date, this priority has not been determined.

4.5 ASSESSMENT OF MITIGATION ACTIONS

Mitigation actions identified in both the SHMP and LHMPs will be tracked and assessed. For the state plan, tracking and assessment of state goals, objectives, and actions will be done in accordance with the Section 1.5 after each Federal disaster declaration, on an annual basis, and at the next three year update point.

For mitigation actions in LHMPs, tracking and assessment will be done differently. The proposed web portal will allow local “plan keepers” to update action items on the website and the Mitigation Branch will outreach to these individuals on an annual basis requesting them to update their actions.

In terms of completed mitigation projects, these projects will be assessed after an event occurs in the area through the research and publication of a mitigation success story. Secondly, the proposed web portal will be tracking each mitigation activity for which a benefit-cost analysis was completed. Based on annual damages avoided data, the web portal will be able to calculate accrued mitigation benefits based on the date of the mitigation activity to present. This is similar to the approach used by the USACE for measuring benefits of their flood control projects.