Summary of Stakeholder Feedback Report: Information Sheet

Building Resilient Infrastructure and Communities
Hazard Mitigation Assistance

Background

Through the Disaster Recovery Reform Act (DRRA) of 2018, Congress authorized the creation of a new pre-disaster mitigation program. To support the implementation of this new grant program, Building Resilient Infrastructure and Communities (BRIC), FEMA received feedback from various stakeholders by way of letters, emails, and through virtual and in-person engagements.

How We Heard From You

FEMA received 75 formal letters and over 5,000 comments submitted through an online crowd-sourcing platform, IdeaScale, and virtual and in-person listening sessions. These included comments from federal, state, tribal, and territorial stakeholders, as well as local partners and members of the general public.

FEMA learned about challenges stakeholders face in building their capability to implement hazard mitigation projects, while gathering ideas and recommendations for how a new grant program can be responsive to their mitigation needs at all levels of government. This report is a summary of the pre-engagement strategy only and does not remove the program's responsibility to allow for a formal comment period on the official policy. This supports FEMA's strategic goals of building a culture of preparedness and reducing program complexity.

What We Heard

The chapters below include examples from the full Summary of Stakeholder Feedback report, including concerns expressed by stakeholders and their recommendations to address those concerns. FEMA appreciates the feedback that was given and is using this feedback to inform the design and delivery of the BRIC program. This report was created to be transparent about what we heard.

Chapter 1 – Formal Letter Analysis

This chapter provides a general overview of the main themes that emerged from stakeholder letters. Each section contains a key statement that reflects one of those themes and is accompanied by a short description that summarizes the letters.

Stakeholder Concerns	Stakeholder Recommendations
• Lack of flexibility associated with the Benefit-Cost Analysis (BCA) methodology	• Expand the range of benefits and costs included in the methodology
• Not enough emphasis on natural infrastructure (natural infrastructure, nature-based, and/or hybrid gray-green infrastructure)	• Make natural (green) infrastructure a top priority
• Most communities do not have the experience, capacity, or capability to effectively start, engage, or manage partnerships	• There is great importance in partnerships for transformational projects. Provide a variety of educational/training resources
• Under-resourced communities will not be competitive against communities with more experience, capacity, and capabilities	• Incentivize cross-jurisdictional planning, engaging the private sector in the planning process, and support disadvantaged small, impoverished, and rural communities by making a wide variety of resources available to enhance the capacity and capability of small impoverished communities
• Cutting funding for hazard mitigation planning will have a variety of negative consequences. Hazard Mitigation Plans (HMPs) are critical to resilience, and communities rely on FEMA funding for their maintenance	• Continue to fund HMPs, but create higher standards, planning integration, and greater accountability of HMPs fulfilling their intended purpose (particularly if FEMA provides the funding)

Chapter 2 – Capacity and Capability

This chapter details comments that provide insight into what the capacity and capability gaps are, as well as some recommendations for addressing them.
This chapter is divided into three sections that reflect literature-based research on dimensions of community capacity: (1) Knowledge and knowledge management, (2) Partnerships, and (3) Technical expertise.

Stakeholder Concerns

- Access to usable, relevant, accurate, comprehensive, and/or up-to-date risk data
- Communities may lack baseline knowledge about addressing certain risks and mitigating hazards
- Stakeholders lack an understanding about project types that are cost-effective solutions to certain hazards
- Lack of awareness of different federal funding sources, potential private funding sources, or eligible in-kind services
- Of all comments related to building code implementation challenges, **28%** referred to some form of education, training, or knowledge deficiency as a barrier to adopting and enforcing building codes
- There are barriers to initiating and sustaining partnerships that are important for mitigation

Stakeholder Recommendations

- Provide resources that show examples/case studies/templates of project types to address certain hazards
- Represent more hazard types in pre-calculated benefits offerings and, in general, provide pre-calculated benefits for more project types
- Offer training on how to effectively solicit funding from potential private partners (i.e., how to get them to "buy in" to mitigation)
- **16%** of all building code-related comments discussed a desire for more/better training or education
- Incentivize or prioritize projects that involve multiple jurisdictions working together on a single project

Chapter 3 – Application Process and Requirements

This chapter details challenges stakeholders experience with the current application process, struggles in relation to particular application requirements and eligibility requirements, and recommendations for changes. The chapter is organized into two main sections: (1) Application process, and (2) Application requirements.

Stakeholder Concerns

- Application process is too complex, lacks flexibility, and needs to be streamlined

Stakeholder Recommendations

- Offer a more streamlined application process to address existing complexities
- Increase transparency regarding how and why final project decisions are made
- Use a universal baseline grant application system for all programs and activities
- Increase Benefit-Cost Analysis (BCA) training and technical assistance
- Provide examples of successful BCAs for different project types
- Provide funding for nature-based infrastructure projects

Chapter 4 – Risk-Informed Decision-Making

This chapter focuses on stakeholder feedback regarding challenges with risk data, including data quality and access, and using risk to inform program funding decisions. This chapter is divided into three sections: (1) Support and concern for risk-informed decision-making, (2) Perceived limitations to making risk-informed decisions, and (3) Risk-informed funding incentivizing poor behavior.

Stakeholder Concerns	Stakeholder Recommendations
• Many stakeholders perceive their current access to usable, relevant, accurate, comprehensive, and/or up-to-date risk data to be inadequate. Of all comments related to risk, **23%** referred to data being incomplete	• Utilize all available sources of risk data (e.g., local-, state-, and national-level datasets) • Partner with agencies/universities that have existing resources to develop and collect risk data • Provide a clear definition of risk to guide stakeholders

Chapter 5 – Hazard Mitigation Planning and Plan and Project Implementation

This chapter centers on stakeholder feedback related to hazard mitigation plans, the planning process, and project implementation. Stakeholder feedback included in this chapter discusses the role of planning in understanding risk and pursuing strategies to build resilience, as well as the issues with plan quality and the implications for identifying solutions, implementing projects, and encouraging meaningful stakeholder engagement and partner coordination. Additionally, the chapter identifies concerns over project Periods of Performance.

Stakeholder Concerns	Stakeholder Recommendations
• Plans are often completed with a "check-the-box" approach • Stakeholder engagement associated with the planning process is currently falling short in many communities • The planning process often lacks coordination with various levels of government and interagency partners • There is limited capacity within small impoverished communities	• Ensure plans focus on the identification of precise vulnerabilities and the development of action plans to address those vulnerabilities • Allocate funding based on plan quality • Provide guidance on how to incorporate lifelines into the hazard mitigation planning process • Incorporate building codes into Hazard Mitigation Plans (HMPs) and ensure plans at the local level are developed properly to meet more than minimum standards • Involve as many stakeholders in the process as possible to get broader ideas for mitigation activities and buy-in, particularly at the local level • Use the planning process to educate local leaders and the public, in addition to gathering their feedback on plans • Ensure transparency through the planning process • Have HMPs be reviewed locally by administrators, financial officers, council chairs, and directors of plans and department heads who are responsible for responding to the hazard events • Incentivize mitigation plans to include regional approaches/solutions, instead of every agency proposing its own mitigation projects in isolation • Allow for greater flexibility in the length of project Periods of Performance • Offer training to communities to improve understanding of the hazard mitigation planning process

Chapter 6 – Tribal-Specific Issues

This chapter emphasizes the unique challenges faced by tribes and the varying levels of capabilities and wide-ranging needs across tribal partners. The chapter also explores stakeholder sentiments related to the focus of BRIC on large infrastructure or lifelines projects, given that these types of projects may not resonate with tribes or meet their needs. This chapter is divided into four sections: (1) Hazard mitigation planning, (2) Capability and capacity building, (3) Program design, and (4) Project development and application.

NOTE: Given the fewer comments from tribal stakeholders than non-tribal stakeholders (648 and approximately 5,000, respectively) and their application to tribal-specific program elements, the analysis was conducted independent of all other BRIC stakeholder engagement comments.

Stakeholder Concerns

- The impact of being rural and isolated
- Low capacity for hazard mitigation and/or grants management
- Tribes in different stages of hazard mitigation planning/experience
- Project eligibility limited by complex land/road ownership
- No tax base can be cost-prohibitive
- Ability to incorporate traditional knowledge into hazard mitigation
- Varied relationships with states/counties

Stakeholder Recommendations

- Incorporate (and/or promote) cultural resources as eligible to mitigate in Hazard Mitigation Plans (HMPs)
- Encourage the inclusion of traditional tribal knowledge into HMPs (e.g., use tribal words for hazards in the headings)
- Offer trainings and workshops designed for a tribal audience
- Create more regional training and innovation centers to host trainings
- Direct annual funding to hire a full-time Hazard Mitigation Specialist
- Develop and share tribal-specific project examples and success stories
- Develop and share templates for project applications (including Advance Assistance)
- Assess the economic impacts of no tribal tax base on the ability to pay to inform equitable non-federal cost shares for tribes
- Measure population by tribal community instead of tribal membership
- Direct funding to small impoverished communities
- Consider calculating the per capita tribal vs. non-tribal allocations of federal grants
- Separate small impoverished and/or tribal communities from larger, more capable communities in the competition

Chapter 7 – Project Monitoring and Evaluation

This chapter discusses topics related to project monitoring and evaluation as well as lesson sharing. Notably, the chapter includes stakeholder feedback focusing on the importance of building a culture of information sharing and highlights the usefulness of sharing case studies, lessons learned, and best practices. This chapter is divided into two sections: (1) Project monitoring and evaluation, and (2) Sharing lessons and best practices to enhance mitigation capacity.

Stakeholder Concerns

- Limited funding for monitoring and evaluating projects after project completion
- Lack of clearly defined metrics for evaluating projects

Stakeholder Recommendations

- Increased emphasis on monitoring and evaluating projects
- Conduct more loss avoidance studies in the aftermath of a disaster
- Analyze loss avoidance data and make it easily accessible for stakeholders
- Conduct site visits to discuss and evaluate the performance of projects
- Provide Evaluation Assistance to encourage project monitoring and evaluation
- Clearly define evaluation metrics
- Share lessons and best practices to enhance mitigation capacity

Please visit **FEMA.gov/BRIC** and select **Summary of Stakeholder Feedback** to view the full report.