Comprehensive Economic Development Strategy and Hazard Mitigation Plan Alignment Guide

September 2022

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Introduction

Our nation faces more frequent and severe disasters every year. Hazard events are getting more powerful because of climate change. Focused planning can help communities prepare for and meet these growing challenges. FEMA helps communities with hazard mitigation planning. The U.S. Economic Development Administration (EDA) helps with Comprehensive Economic Development Strategies (CEDS). FEMA and EDA are helping local and regional partners identify opportunities to align these processes. The two processes can support each other. The goal of alignment is to link strategic priorities, leverage funding and invest in actions that reduce risks.

Some economies are more vulnerable to the effects of a disaster. They take longer to recover. For example, after Hurricane Harvey in 2017, many local coastal economies saw huge losses when tourism slumped. An area’s economy must be able to weather shocks or disruptions and recover quickly. This Guide shows how economic development and hazard mitigation planning can support each other. It builds on EDA’s requirement for a CEDS to include economic resilience. It also builds on earlier work by EDA and FEMA. Key resources include:

- EDA’s [CEDS Content Guidelines](#).
- FEMA’s [Local Mitigation Plan Review Guide](#) and future updates.¹
- FEMA’s [Local Mitigation Planning Handbook](#).

See Section 8 for additional resources.

The Resource Guide includes economic development concepts to add to a hazard mitigation plan. It lists hazard mitigation ideas to use in the CEDS. Aligning these federal planning tools can make local planning more meaningful and inclusive. It also increases access to funding.

¹ FEMA released an update to this policy on April 19, 2022. The [Local Mitigation Planning Policy Guide](#) will replace the Local Mitigation Plan Review Guide on April 19, 2023.
Defining Resilience

A CEDS must incorporate "economic resilience." A hazard mitigation plan addresses "natural hazard resilience." It uses strategies to reduce risk before a disaster and recover after one. But what does resilience mean?

EDA defines resilience as the ability to predict, withstand and recover from economic disruptions. These may include:

- Natural and human-caused hazards (e.g., flooding, drought, tornado or pandemic).
- The closure of a large employer (e.g., a factory or power plant).
- The decline of an important industry or supply chain (e.g., manufacturing, natural resource extraction, tourism, agriculture or technology).
- Changes in the workforce (e.g., leaving the area or skill specialization).

To build economic resilience, communities must understand their risk to economic disruptions. They must evaluate how economic assets may be affected. They can then develop a responsive capacity.

To FEMA, community resilience is the ability to prepare for anticipated hazards, adapt to changing conditions and withstand and recover rapidly from disruptions. Prevention, protection, mitigation, response and recovery actions support resilience.

A community’s resilience reflects its ability to know and plan for its risks and reduce stressors. Stressors are the social, economic and environmental conditions that weaken a community. It must evaluate how the risks can affect its economy. That knowledge will help it gain the right resources to reduce risk and bounce back more quickly.

Aligning the CEDS with hazard mitigation planning increases collaboration and coordination. This may result in more inclusive planning. Planning will be better informed and will protect communities from a range of hazards. Plans that show multiple benefits can lead to broader support across the community, particularly for local officials that have to make tough choices on how to spend public funding. The CEDS’ focus on economic resilience works well with hazard mitigation goals. An economy’s resilience may prevent hazards from becoming local disasters. It shapes the pace of the local recovery after a disaster. It can also protect tax revenue and the tax base from losses. It lessens the effects of disasters on workers in industries subject to economic uncertainty. In the

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2 EDA Economic Resilience. [https://www.eda.gov/ceds/content/economic-resilience.htm](https://www.eda.gov/ceds/content/economic-resilience.htm)
same way, a hazard mitigation plan assesses risks to key assets. These assets include the economy, population, infrastructure and lifelines, natural and cultural resources and capabilities.

At the regional and local levels, people skilled in economic development can be active partners in building economic resilience. They can help communities strengthen their ability to withstand disasters. Those who know hazard mitigation can help identify hazards, find solutions and reduce long-term risk. Together, they become a focal point for coordination, sharing information and responding to external questions before and after a disaster. They may also lead the management of federally funded grants.
Making the Case for Plan Alignment

“Plan alignment” adds common principles and priorities to state, local, tribal, territorial or regional plans, policies, codes and programs. When done right, it allows emergency management, economic development staff, community planners and local officials to collaborate on a routine basis. This builds momentum to carry out the plans, which leads to better results.

To successfully align plans, people must collaborate. This is most effective when coupled with robust and inclusive engagement. Use the engagement to gather input from the public, agencies, other sectors and interests. When leaders identify common priorities, the community has greater ownership of their resilience. More people can lend support and realize shared interests. Aligning plans will also help define roles and responsibilities. Once roles are defined, communities can begin to advance their goals for economic development and risk reduction.

1. Why Align Plans?

Aligning plans increases coordination. It also makes planning more efficient. It builds buy-in for activities that support safer, more resilient communities. When plans are aligned, information is more readily shared across the whole community. Plans are more targeted. They reinforce each other and are easier to implement. Aligned plans have greater impact. Communities that align plans may have more options for federal, state and local funding and other resources. They can also use the funding and resources together in creative ways to improve outcomes.

When communities align their CEDS and mitigation plans:

- Businesses and business districts are built in safer areas with a lower risk of hazard impacts.
- Private investment is directed to safer areas and developed to be more resilient to hazards.
- Buildings are placed and constructed to standards that help them withstand hazard events.
- Businesses can stay open through an event or reopen quickly after it.
- Critical facilities and infrastructure function during and after events.
- Economies can diversify. This builds their ability to withstand and recover from hazard events.
- Local and regional partners can identify and plan for shared goals to protect, sustain and diversify the community’s economic base.
- Regional marketability improves as businesses and investors see the community as safe and well prepared.
- The community can manage open space and natural resources in ways that reduce hazard impacts and support the economy through agriculture and tourism.

Both economic development and mitigation staff can bring resilience ideas to a CEDS and hazard mitigation plan. This can have a positive effect on the community’s ability to recover from and improve resilience to future events.

### Tips for Getting Started

- Identify the agency or agencies preparing the CEDS and hazard mitigation plan. Clarify the geographies each plan covers. Together, align the planning activities and goals.

- Identify the update cycles for the two processes. Setting up a similar cycle for both will support alignment.

- If the same people are members of CEDS and hazard mitigation plan groups, combine them for shared topics.

- Find areas where the plans can inform each other. For example, the risks and vulnerabilities in the hazard mitigation plan may inform the CEDS Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis.

- Review the plans’ public participation and partner engagement processes. Create efficiencies and reduce engagement fatigue. Your partners will thank you!

- Consider other related plans or planning processes (e.g., comprehensive plans and climate adaptation plans). Consider aligning those plans, too.

- Ask federal, state, regional, local, tribal and territorial agencies; nonprofits; businesses; and community leaders about other ways to align and implement plans.

### 2. Case Studies

These case studies show how states, regions and local jurisdictions have aligned their plans. The results have strengthened their resilience and recovery abilities.

**Plan Alignment Case Studies**

*Association of Bay Area Governments, “California Resilience Planning Legislation and Implications for Bay Area Cities”* – This resource gives the status of Local Hazard Mitigation Plans (LHMPs) in the nine-county Bay Area. It lists when each LHMP needs to be updated. It can be used to coordinate LHMP updates with other planning work. Communities updating their LHMPs may also find it helpful to know who else is doing this at the same time.
**Building Economic Resilience in the Kerr-Tar Region: Recommendations for Linking Comprehensive Economic Development Strategies and Hazard Mitigation Plans** – This report covers a technical assistance project by the NADO Research Foundation and the University of Louisville Center for Hazard Research and Policy Development. The project helped the Kerr-Tar (NC) Regional Council of Governments, an EDA-designated Economic Development District (EDD), to align its CEDS and hazard mitigation plans.

**Coastal Plan Alignment Compass** – This tool helps California’s coastal communities develop and coordinate local plans. Aligning the planning can help them achieve multiple climate mitigation and adaptation goals. It can also reduce duplicate work and avoid policy conflicts.

**Houston-Galveston Area Council Regional Economic Resilience Plan** – Houston, TX’s 2018 CEDS includes planning for floods and hardening utilities. The city also used lessons it learned from Hurricane Harvey recovery.

**Larimer County Resiliency Framework** – Larimer County, CO communities built a regional framework to prepare for future shocks and stresses. Using the state’s Resiliency Framework as a model, the county, municipalities and community organizations created a shared vision and goals. They looked at six resiliency sectors and set strategies and projects to address areas of weakness.

**Resilient Regions: Integrating Economic Development Strategies, Sustainability Principles and Hazard Mitigation Planning** – This NADO report shows how several regional organizations folded mitigation and sustainable development into economic recovery and resilience work.

**Southeastern Vermont CEDS** – This report describes the region’s economic weaknesses and recommends a strong set of actions to address them.
Aligning CEDS and Hazard Mitigation Plans

People who work with economic development and hazard mitigation can set the course for seeking federal grants. The CEDS and hazard mitigation planning processes are based on federal legislation and the Code of Federal Regulations (CFR). Those regulations, administered by EDA and FEMA, are in Appendix 1.

Successful plan alignment starts with understanding how the two processes line up. Figure 1 shows four compatible elements to consider. Each section explains the plan elements and opportunities for alignment.

**Figure 1. CEDS and Mitigation Plan Alignment**

1. **Getting Started**

A critical first step is for local CEDS and hazard mitigation planning teams to know and agree on the benefits of aligning the plans. If the same agency or group prepares both plans, alignment may be easy. The same applies to plans that cover the same areas.

The lead agencies should also see how closely the existing CEDS and hazard mitigation plan five-year update cycles align. This can lead to opportunities to line up the timing of the planning processes. They should also consider other existing planning processes or decisions. They, too, should be aligned if possible.
Next, the lead agencies should align the people involved. The CEDS and hazard mitigation planning processes each have steering committees and stakeholder groups. They may overlap. The lead agencies should unite those groups for focused meetings or to discuss shared topics. The public participation and stakeholder engagement for the two plans can also be combined. This is more efficient and may reduce engagement fatigue. Once the CEDS and hazard mitigation planning committees are organized, the lead agencies must clarify the goal of alignment to the members. This establishes a clear understanding and goals for each planning process and outcome.

2. The Planning Process

2.1. Overview

To successfully align CEDS and hazard mitigation plan documents, define your planning process well. Identify people (in a variety of roles) to guide each process and keep the public engaged. Sections 2.2 and 2.3 discuss stakeholder engagement and public involvement. These are key to both planning processes.

2.2. Stakeholder Engagement

Both the CEDS and hazard mitigation plans use a continuous planning process. They involve broad-based and diverse participation. Both must describe how they requested, gathered and used stakeholder input. They should state how the planners included different stakeholders (e.g., public sector, private interests, nonprofits, educational institutions and community organizations). They must also say how they formed the Strategy Committee or Planning Team.

Table 1 lists the stakeholders common to the CEDS and hazard mitigation planning processes. An appointed team of must oversee each planning process. This team should include people or organizations invested in the regional economy and mitigation projects. Many stakeholder groups may be part of both plans, while a few may not have been involved with either. By aligning or even combining engagement efforts, communities can expand the value of each planning effort and support each plan’s implementation.

Table 1: CEDS and Hazard Mitigation Plan Stakeholders

<table>
<thead>
<tr>
<th>Typical CEDS Stakeholders</th>
<th>Typical Hazard Mitigation Plan Stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>▪ Community leaders from historically un- and underrepresented neighborhoods.</td>
<td>▪ Adjacent communities.</td>
</tr>
<tr>
<td>▪ Community leaders with an interest in the economic development of the affected area.</td>
<td>▪ Businesses and development organizations.</td>
</tr>
<tr>
<td>▪ Cultural and artist support institutions.</td>
<td>▪ Conservation districts.</td>
</tr>
<tr>
<td>▪ Dependent care providers for both children and adults.</td>
<td>▪ Private and non-profit organizations.</td>
</tr>
<tr>
<td></td>
<td>▪ Local fire departments.</td>
</tr>
</tbody>
</table>
The Strategy Committee and Planning Team represent varied stakeholders. For proper plan alignment, the leaders of each planning process must include a cross-section of partners. This will encourage them to share the ideas and priorities of each planning process. The resulting plan documents will reflect that.

The following table presents the requirements for organizing the Strategy Committee and Planning Team.

<table>
<thead>
<tr>
<th>Typical CEDS Stakeholders</th>
<th>Typical Hazard Mitigation Plan Stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>▪ Downtown organizations, including Main Street, improvement districts, etc.</td>
<td>▪ Local historic commission or historic architectural review board.</td>
</tr>
<tr>
<td>▪ Employment agencies.</td>
<td>▪ Local governments, including special districts:</td>
</tr>
<tr>
<td>▪ Entrepreneurship/innovation groups.</td>
<td>▪ Planning.</td>
</tr>
<tr>
<td>▪ Grocery and food service providers.</td>
<td>▪ Economic Development.</td>
</tr>
<tr>
<td>▪ Health care providers, including continuum care facilities.</td>
<td>▪ Emergency Management.</td>
</tr>
<tr>
<td>▪ Housing agencies, including homeless shelter organizations.</td>
<td>▪ Public Health.</td>
</tr>
<tr>
<td>▪ Industry advocacy organizations such as a restaurant association, manufacturing</td>
<td>▪ GIS/Mapping.</td>
</tr>
<tr>
<td>extension program, tourism and convention and visitors’ bureaus.</td>
<td>▪ Neighborhood groups and housing organizations.</td>
</tr>
<tr>
<td>▪ Insurance representatives.</td>
<td>▪ Nonprofit entities.</td>
</tr>
<tr>
<td>▪ Local and county planning organizations, including EDA-designated EDDs.</td>
<td>▪ State Department of Community and Economic Development.</td>
</tr>
<tr>
<td>▪ Relevant institutions of higher learning.</td>
<td>▪ State Department of Environmental Protection.</td>
</tr>
<tr>
<td>▪ Small Business Development Centers (SBDCs)</td>
<td>▪ State Natural Resources and Forestry.</td>
</tr>
<tr>
<td>▪ State and local environment, parks and recreation and historic resource agencies.</td>
<td>▪ State Emergency Management Agency.</td>
</tr>
<tr>
<td>▪ State, county and local economic development agencies.</td>
<td>▪ State Historic Preservation Office.</td>
</tr>
<tr>
<td>▪ Transportation agencies.</td>
<td>▪ Universities and other academic institutions.</td>
</tr>
<tr>
<td>▪ Workforce Investment Boards (WIBs).</td>
<td>▪ Volunteer disaster relief organizations such as the Red Cross.</td>
</tr>
<tr>
<td>▪ Other stakeholders as applicable, based on local circumstances and needs.</td>
<td></td>
</tr>
</tbody>
</table>
### 2.3. Public Participation

Public participation is critical to planning. An engaged public will help create a CEDS and hazard mitigation plan that reflect their communities. A well-designed and -executed process will inform and engage constituents in the planning. It will help them understand each plan’s importance and relevance. In turn, public participation gives leaders more complete information for making decisions. This comes in the form of facts, values and perspectives. Success in public participation is often the result of thorough and thoughtful planning. Its effectiveness depends on how well an agency commits to and prepares for it. This is especially important when providing the information needed to build effective relationships with key stakeholders.

| CEDS Strategy Committee  
13 CFR § 303.6(b)(1) | Hazard Mitigation Planning Team  
44 CFR § 201.6(b) |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>The CEDS Strategy Committee is responsible for developing, applying, revising or replacing the CEDS for the Planning Organization. The Planning Organization appoints the Strategy Committee. Its members must represent the main economic interests of the region. These interests may include tribes, the private sector, state and other public officials, community leaders, private individuals, representatives of workforce development boards, institutions of higher education, minority and labor groups and others who can contribute to and benefit from improved economic development in the region. The Strategy Committee must demonstrate the capacity to take on a collaborative and effective planning process.</td>
<td>The jurisdictions participating in the plan provide input on, review and analyze each section of the plan. This is usually done with a hazard mitigation planning team. The plan must show documentation that the public and stakeholders had meaningful opportunities to participate throughout the entire process. Establishing a Steering Committee to help drive the planning process and reconvene the planning team is also recommended and proven to be effective. An ideal planning team consists of local emergency and floodplain management staff, planning staff and a diverse set of stakeholders who will be invested in any mitigation action stemming from the plan. A stakeholder is any organization that has assets, operates in or moves through the local jurisdiction or region. In addition, participation from each jurisdiction is required.</td>
</tr>
</tbody>
</table>
The following table presents the requirements for public participation in the CEDS and hazard mitigation planning efforts.

<table>
<thead>
<tr>
<th>CEDS Public Participation</th>
<th>Hazard Mitigation Plan Public Participation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>13 CFR § 303.6(b)(2)</strong></td>
<td><strong>44 CFR §§ 201.6(b), 201.6(c)(1), and 201.6(c)(4)(iii)</strong></td>
</tr>
</tbody>
</table>

The Planning Organization must provide the public and appropriate governments and interest groups plenty of notice that the CEDS process is happening. It must also provide the opportunity to comment on the CEDS. The comment period must be at least 30 days long. The Planning Organization must make the CEDS readily available throughout the comment period.

EDA may require the Planning Organization share comments received and show how the comments were resolved.

Mitigation plans rely on an open public involvement process. A comprehensive planning process must include:

- A meaningful opportunity for the public to be involved in the planning process, and what that participation entailed.
- An opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development, as well as businesses, academia and other private and non-profit interests to be involved in the planning process.
- The review and incorporation, if appropriate, of existing plans, studies, reports, and technical information.

The plan must document the planning process used, including how it was prepared, who was involved in the process and how the public was involved. The plan must also discuss how the community will continue public participation in the plan maintenance process.

3. **Planning Element 1: CEDS Summary Background and Hazard Mitigation Plan Community Profile**

The first plan element is the CEDS summary background and the mitigation plan community profile.

<table>
<thead>
<tr>
<th>CEDS Summary Background</th>
<th>Hazard Mitigation Plan Community Profile</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>13 CFR § 303.7(b)(1)(i)</strong></td>
<td><strong>Not required under 44 CFR § 201.6</strong></td>
</tr>
</tbody>
</table>

Plans must be unique and responsive to the relevant region and developed as part of a continuous process that involves broad-based and diverse public and private sector participation. They include a summary background of the economic development conditions of the region.

The community profile details the population, land use, transportation and other socioeconomic and infrastructure characteristics of the planning area. It provides context for what makes the planning area special and often outlines what the community wants to protect.
3.1. CEDS Summary Background

A CEDS must have a summary background of the region’s economic conditions. It should answer the question, “What have we done?” It should provide a clear understanding of the local economic situation, based on current, relevant data. The information should be concise and easily understood by the public. Data in this section should be presented in a way that clearly connects it to the SWOT analysis and strategic direction.

3.2. Hazard Mitigation Plan Community Profile

Although the CFR does not require it, hazard mitigation plans should have a community profile. This profile captures the area’s geography, demography, history, culture and environment. These details lead to a broader understanding of the area’s hazards and mitigation capabilities.

3.3. Plan Alignment Considerations

The CEDS summary background and hazard mitigation plan community profile should be aligned. The economic composition, assets and hazard risks of the community or region should agree.

Where possible, coordinate the data collection and analysis for the CEDS and hazard mitigation plan. This will avoid duplicate use of time and resources. Be sure the analysis benefits both plans and cross-pollinates the information needed for each planning process.

Typical information to consider includes the following:

- Demographic and socioeconomic data, including vulnerable, low-income and minority populations. Identify population hubs and higher-risk land uses. These include industrial facilities, rail freight lines, airports, waterways and interstate routes.

- Environmental, geographic, climatic and cultural data, including historic sites; natural resource profiles.

- Land use, zoning and building codes and regulations.

- Area infrastructure, including water, sewer, telecommunications/broadband, energy distribution systems, transportation modes, etc. This can include the location, construction standards, age and life expectancy of critical infrastructure and facilities in the area. Note any dependencies between infrastructure systems, critical facilities and the people they serve.

- Major employers, primary economic sectors and commercial centers. Focus on those whose loss or inoperability would affect the community’s ability to recover from a disaster.

- Emerging or declining clusters or industry sectors. Include their past, present and projected impacts on the region’s competitive advantages and ability to increase economic development.
Also, it is important to do the following:

- Capture and promote the advantages of Qualified Opportunity Zone communities within a distinct economic region. Highlight and emphasize how key regional assets are linked.
- Assess the dependencies between economic sectors and businesses and the infrastructure needed to support them.
- Consider how an area's economy compares to that of a larger region or state (including a global perspective). Pay close attention to local advantages or disadvantages.
- Identify any data limitations to support a complete inventory, assessment and characterization of the region.


The second plan elements are the CEDS SWOT analysis and hazard mitigation plan risk and capability assessments. Project committees can begin to share information and start collaborating.

<table>
<thead>
<tr>
<th>CEDS SWOT Analysis</th>
<th>Hazard Mitigation Plan Hazard Risk Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>13 CFR § 303.7(b)(1)(ii)</td>
<td>44 CFR § 201.6(c)(2)</td>
</tr>
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The SWOT analysis is an in-depth analysis of regional strengths, weaknesses, opportunities and threats.

The hazard identification and risk assessment identifies the natural hazards that can affect the jurisdiction and describes the potential consequences of hazards that may affect the planning area.

<table>
<thead>
<tr>
<th>Hazard Mitigation Plan Capability Assessment</th>
<th>§ 201.6(c)(3)</th>
</tr>
</thead>
</table>

The capability assessment evaluates the resources a community has and can use to reduce their hazard risk. Capabilities often fall into four categories: administrative and technical, financial, planning and regulatory and education and outreach. The assessment also describes how each participating jurisdiction can expand on and improve their capabilities.

4.1. CEDS SWOT Analysis

A SWOT analysis of the regional economy should answer, “Where are we now?” The data discussed above, with other information, will identify the region’s unique assets and competitive positioning.
Table 2 explains the four SWOT analysis elements.

**Table 2: SWOT Analysis**

<table>
<thead>
<tr>
<th>Favorable</th>
<th>Harmful</th>
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<tbody>
<tr>
<td><strong>Internal</strong>&lt;br&gt;Strengths are a region’s relative competitive advantages. They can be industry supply chains and clusters, port, rail, and broadband assets, special workforce skills, higher education levels or stakeholders who work together. These are often internal.</td>
<td>Weaknesses are a region’s relative competitive disadvantages. For example, it has a risk-averse or change-resistant culture. These are also often internal.</td>
</tr>
<tr>
<td><strong>External</strong>&lt;br&gt;Opportunities are chances for regional improvement or progress. For example, a research lab in the region is expanding. These are often external.</td>
<td>Threats are possible negative impacts on the region or a regional decline. For example, companies may be considering moving to lower-cost areas of the state. These are also often external.</td>
</tr>
</tbody>
</table>

Organizations use the SWOT tool for strategic planning. It helps them set a clear objective based on their capabilities and capacity. A SWOT analysis identifies what makes the region special or competitive in larger economies. These strengths are compared with factors that could keep it from realizing its potential. Knowing a region’s capacity for growth is critical to choose how to promote economic vitality. It is affected by cultural, economic, technological, intellectual and physical assets. A region can use the activities and engagement of business, government leaders and others to maximize its economic potential.

The SWOT analysis should also consider economic resilience. What factors or elements are in place (or need to be put in place) to ensure the economy’s long-term success, viability and durability?

**4.2. Hazard Mitigation Plan Hazard Risk and Vulnerability Assessments**

A mitigation plan identifies and profiles the hazards that occur or could occur in the planning area. Both natural and human-caused hazards can be listed. Profiles describe the details of each hazard. These include location, extent, past events and the probability of future events.

The vulnerability assessment includes a summary of each hazard and its impact on community assets. Impacts can be described in different ways. They can refer to the population at risk, percentage of damage or dollar losses. Knowing how hazards can affect historic and cultural resources can reveal the risk to a community’s character. A vulnerability assessment includes the areas susceptible to each hazard and places where losses could be highest. Use this type of information to develop effective mitigation strategies. The vulnerability assessment should help the planning team prioritize hazards, based on the risk to the most important community resources. The team can then build a mitigation strategy.
4.3. Hazard Mitigation Plan Capability Assessment

The mitigation plan’s capability assessment lists resources a community can use to mitigate its risk. It records the participating jurisdictions’ existing planning and regulatory tools. It also reviews their ability to improve those capabilities. The assessment identifies gaps, conflicts and weaknesses. These can be addressed in future mitigation goals and actions. The assessment also highlights existing measures that will support future mitigation. Using it results in practical mitigation actions that can be completed.

4.4. Plan Alignment Considerations

The mitigation plan’s risk and vulnerability assessment describes weaknesses or threats to the community or region. The mitigation plan’s capability assessment can reveal strengths and opportunities. Using the CEDS SWOT analysis to assess the internal and external factors affecting resilience is one step to align the plans. Add the hazard mitigation plan’s risk, vulnerability and capability assessments to the analysis as follows:

- **Strengths and Weaknesses (internal to the planning area):**
  - What strengths (and existing capabilities) make the planning area more resilient to an economic disruption or hazard event?
  - What weaknesses (and capability deficiencies) make it more vulnerable to an economic disruption or hazard event?
  - What are the region’s economic “weak spots” (vulnerabilities)?
  - Is there a specific asset deficiency? (Look at workforce skills, excessive dependency on a single employer or industry, lack of transportation access/options, insufficient broadband availability and/or adoption, barriers to finding financial resources to advance businesses or major employers in vulnerable areas)?
  - What existing industry sectors are projected for growth and decline?
  - Which areas are most distressed?
  - What is driving job creation or loss? What is the general state of the economy?
  - How well does the workforce development system connect people to jobs? Does it build the skills needed to support future paths to employment?

- **Opportunities and Threats (external to the planning area):**
  - What partners or resources outside the planning area would help strengthen resilience?
  - What capabilities do these partners and resources provide to fill existing deficiencies?
  - What external forces negatively affect the region’s resilience capabilities and resources?
  - How is the region positioned to succeed in the national and global economies?
  - What sources of exports, tourism and foreign direct investment could bring new wealth to the region?
  - What industry sectors and clusters have growth potential through international trade and investment? What are the region’s target foreign markets based on these industries?
What local public, private and nonprofit partnerships promote exports and increase the region’s export base?

What strategic needs or gaps would prevent fully applying an export promotion and investment attraction program (e.g., foreign outreach events, marketing materials and research; and regional transportation infrastructure or regulatory issues)?

What current and future hazard risks threaten the above?

5. Plan Element 3: CEDS Strategic Direction/Action Plan and Hazard Mitigation Plan Mitigation Strategy

Element three is the CEDS strategic direction and action plan and the mitigation strategy.

<table>
<thead>
<tr>
<th>CEDS Strategic Direction/Action Plan</th>
<th>Hazard Mitigation Plan Mitigation Strategy</th>
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</thead>
<tbody>
<tr>
<td>13 CFR § 303.7(b)(1)(iii)</td>
<td>44 §§ 201.6(c)(3)</td>
</tr>
<tr>
<td>The strategic direction and an action plan flows from the SWOT analysis. This direction and action plan should be consistent with other relevant state/regional/local plans. The region’s vision, goals and measurable objectives, with an assessment of the region’s competitive advantages, should form the basis of the strategic direction and action plan. The strategic direction and action plan should incorporate the concept of economic resilience, either as a separate section or embedded throughout the document. It should consider planning for and implementing resilience initiatives to strengthen steady state economies, as well as regional initiatives to prepare for and respond after an economic disruption occurs.</td>
<td>The mitigation strategy establishes priorities for reducing risk. It also includes developing short- and long-term actions for reducing the effects of disasters. The strategy also includes an action plan that outlines who is responsible for each action along with potential funding and expected time frames for completion. The mitigation strategy should incorporate the disaster resilience concepts that consider a whole-community approach relative to indicators of physical, economic, environmental and social resilience during and after disasters and threats.</td>
</tr>
</tbody>
</table>

5.1. CEDS Strategic Direction/Action Plan

The strategic direction and its action plan in the CEDS are the heart and soul of the document. They should answer the questions “Where do we want to go?” and “How do we get there?” by leveraging the SWOT analysis. The strategic direction and action plan should logically flow from the region’s assets and limitations to its role in capacity building. The strategic direction evolves from a clear vision with prioritized goals and measurable objectives. A successful action plan should focus on those regionally driven priorities. The priorities will bring the prosperity goals of the region’s stakeholders to fruition.
5.2. **Hazard Mitigation Plan Mitigation Strategy**

Much like the action plan is for CEDS, the mitigation strategy is the heart of the hazard mitigation plan. All other sections lead to a realistic, risk-based mitigation strategy. This identifies a range of activities to reduce vulnerability. It includes how the process identified, prioritized and applied those mitigation actions.

There are four categories of mitigation activities:

1. **Local plans and regulations** – Actions that include government authorities, policies or codes that influence the way land and buildings are developed and built.
2. **Structure and infrastructure** – Actions that modify structures and infrastructure or build new structures to reduce hazard vulnerability.
3. **Natural systems protection** – Actions that minimize damage and losses by preserving or restoring the functions of natural systems.
4. **Education and awareness** – Actions that inform and educate citizens, officials and property owners about hazards and potential ways to mitigate them. They may include participation in national programs.

5.3. **Plan Alignment Considerations**

The CEDS and hazard mitigation plan strategies can align in many ways. This will result in economic resilience and hazard mitigation goals that complement each other. It will also help participants consider how to continue stakeholder and public involvement through education and awareness programs.

The following list includes sample opportunities to align CEDS and hazard mitigation action plans.

- **Plans and regulations.**
  - Align the CEDS and mitigation plan with other plans, like comprehensive/master plans, long-range transportation plans, climate adaptation plans, conservation or natural systems plans, workforce development plans and organizational strategic business plans.
  - Create a regional resilience plan with economic and disaster resilience concepts.
  - Enact or amend zoning and land development, floodplain or stormwater management ordinances.
  - Evaluate opportunities to integrate economic development and mitigation strategies with:
    - Capital improvement planning and budgeting.
    - Evacuation plans.
    - Disaster recovery plan.
    - Debris management plans.
    - Land use ordinances.
    - Subdivision regulations.
‒ Development review.
‒ Building codes and enforcement.
‒ National Flood Insurance Program Community Rating System efforts.
‒ Open space preservation.
‒ Stormwater management regulations and master plans.
‒ Floodplain and watershed management plans.
‒ Waterfront revitalization program.

Ⅲ Structure and infrastructure projects.

  o Critical infrastructure protection.
  o Backup power supply.
  o Broadband development.
  o Asset management programs and systems.
  o Energy development.

Ⅳ Education and Awareness Programs.

  o Create a regional resilience task force from CEDS and hazard mitigation plan stakeholders.
  o Include regional disaster preparedness and recovery work. Examples are Business Continuity and Continuity of Operations plans for the private and public sectors.
  o Strategize ways to diversify the economy or realign the workforce to support emerging industries. Include those focused on resilience and sustainable technologies.
  o Align resilience objectives with statewide initiatives and regional resilience strategies.
  o Identify financial and technical resources to support priority strategies to meet specific resilience goals and objectives.

6. Planning Element 4: CEDS Evaluation Framework and Hazard Mitigation Plan Maintenance and Adoption

The last element is the CEDS evaluation framework and the mitigation plan maintenance and adoption.

<table>
<thead>
<tr>
<th>CEDS Evaluation Framework</th>
<th>Hazard Mitigation Plan Maintenance</th>
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<tbody>
<tr>
<td>13 CFR § 303.7(b)(1)(iv)</td>
<td>44 CFR §§ 201.6(c)(4)(i) and 201.6(c)(4)(iii)</td>
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</table>

The CEDS evaluation framework should establish criteria and performance measures for evaluating the region’s implementation of the strategic direction and progress toward goals and measurable objectives. The elements of the CEDS, seen through a lens of economic resilience, should logically build

The mitigation plan is a living document that guides actions over time. The plan must discuss how the plan will be kept current. This includes tracking implementation over time, evaluating how effective the plan is at meeting its goals and reviewing and revising the plan at least once every five years.
6.1. **CEDS Evaluation Framework**

The evaluation framework is a way to gauge progress on the CEDS' overall success. It is also a source of information for the CEDS Annual Performance Report required by EDA. These regular updates keep the CEDS strategic direction and action plan current and relevant. The evaluation framework is important to ongoing planning. It should answer the questions “How are we doing?” and “What can we do better?” The framework’s measures and timelines should flow from the strategic direction and action plan. These in turn flow from the SWOT analysis. Performance measures should evaluate progress toward the vision, goals and objectives. EDDs and communities should consider performance measures for evaluating regional impact. These measures can be traditional (e.g., jobs created and/or retained, private investment) or non-traditional (e.g., wealth creation such as gross domestic product per capita, household income, per capita income, wages or net worth).

6.2. **Hazard Mitigation Plan Maintenance and Adoption**

The hazard mitigation plan must describe how it will be maintained over time. Continued maintenance keeps the plan current and relevant. It also serves as the basis for future updates to the region’s hazard mitigation plan. It should define how public participation will continue. The hazard mitigation plan will include a schedule for monitoring, evaluating and updates over the next five years. These plans should be reviewed and evaluated annually, at a minimum. It is important to document the “who, when and how” of plan maintenance.

6.3. **Plan Alignment Considerations**

An alignment of the CEDS evaluation framework and hazard mitigation plan maintenance should consider the following:

- Plan for long-term collaboration. Form a regional resilience task force, based on the CEDS and hazard mitigation planning committee. It will oversee and manage resilience efforts. The group should be convened quarterly or at least annually.
- Does the planning area have an “anticipatory focus” so it can react quickly to future events?
Do community economic developers work with local/regional emergency managers to address the risks identified through ongoing resilience planning?

Do local leaders regularly use tools (e.g., scorecards, regional status reports or economic dashboards) to assess the regional economy?

Do the local governments and major employers have access to “surge” capital/credit resources?

Does the planning area know its assets enough to identify emerging economic sectors that may diversify the economic base?

7. **Summary and Next Steps**

The EDA CEDS and FEMA hazard mitigation plan have common goals and approaches. Communities should consider combining these processes. The benefits include stronger communication, shared ideas, plan buy-in and securing funds.

Aligning these two processes can draw in a wider group of stakeholders. This can result in a quicker, more complete disaster recovery. By joining their focuses, communities can create and apply a more holistic recovery strategy and improve resilience.

8. **Resources**

The following resources provide information to support plan alignment.

### CEDS-Hazard Mitigation Plan Alignment Contacts

- EDA-designated EDDs: [https://eda.gov/resources/directory/](https://eda.gov/resources/directory/)
- EDA Regional Integrators. [https://www.eda.gov/edi/contact/](https://www.eda.gov/edi/contact/)
- FEMA Regional Mitigation Planners. [https://www.fema.gov/about/contact#regions](https://www.fema.gov/about/contact#regions)
- State Hazard Mitigation Officer or Mitigation Planners. [https://www.fema.gov/grants/mitigation/state-contacts](https://www.fema.gov/grants/mitigation/state-contacts)

### CEDS-Hazard Mitigation Plan Alignment Resources

EDA Resources:

- CEDS Content Guidelines. [https://eda.gov/ceds/content/](https://eda.gov/ceds/content/)
- Investment Priorities for its grant programs, including recovery and resilience. [https://eda.gov/about/investment-priorities/](https://eda.gov/about/investment-priorities/)
- Resilience Analysis and Planning Tool. [https://www.fema.gov/rapt](https://www.fema.gov/rapt)

NADO Resources:
- Disaster Resilience Resources. [https://www.nado.org/category/resources/disaster-recovery/](https://www.nado.org/category/resources/disaster-recovery/)
- CEDS Central resource and training archive. [https://www.cedscentral.com/](https://www.cedscentral.com/)

Other Resources:
- Disaster Resilience: A National Imperative. [https://doi.org/10.17226/13457](https://doi.org/10.17226/13457)
- EPA and FEMA, Regional Resilience Toolkit [https://www.epa.gov/smartgrowth/regional-resilience-toolkit](https://www.epa.gov/smartgrowth/regional-resilience-toolkit)
- U.S. Census Community Resilience Estimates (CRE) and CRE Equity Supplement (CRE for Equity), data tools. [https://www.census.gov/programs-surveys/community-resilience-estimates.html](https://www.census.gov/programs-surveys/community-resilience-estimates.html)
- U.S. Cluster Mapping Project. [https://eda.gov/about/cluster-mapping/](https://eda.gov/about/cluster-mapping/)
Appendix 1. CEDS and Hazard Mitigation Plan Regulatory Requirements

This appendix presents the requirements, participants and processes for the CEDS and hazard mitigation plans. It includes the regulatory citations for each planning process.

CEDS and Hazard Mitigation Plan Summary Information

<table>
<thead>
<tr>
<th>CEDS</th>
<th>Hazard Mitigation Plan</th>
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<tbody>
<tr>
<td>Federal Regulations</td>
<td>Title 44, Section 201.6 of the CFR (44 CFR § 201.6)</td>
</tr>
<tr>
<td>Title 13, Sections 303.6 and 303.7 of the CFR (13 CFR §§ 303.6 and 303.7)</td>
<td>The Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C., Section 322, as amended by the Disaster Mitigation Act of 2000 (Public Law 106-390, as amended) stipulates the requirements to develop, submit for approval and adopt a mitigation plan that outlines processes for identifying the natural hazards, risks and vulnerabilities of the area under the jurisdiction of the government. For more information on the specific requirements for a FEMA-approved mitigation plan, refer to the <a href="#">Local Mitigation Plan Review Guide</a> and future updates.</td>
</tr>
<tr>
<td>13 CFR § 303.6 Partnership Planning and the EDA-funded CEDS Process: If EDA awards Investment Assistance to a Planning Organization to develop, revise or replace a CEDS, the Planning Organization must follow the procedures set forth in § 303.6 and must develop and submit to EDA a CEDS that complies with the requirements of § 303.7. Note: This guide addresses EDA-funded CEDS studies pursuant to the requirements under 13 CFR § 303.7(b)(1).</td>
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Federal Administering Agency

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<thead>
<tr>
<th>CEDS</th>
<th>Hazard Mitigation Plan</th>
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<tr>
<td>Local Lead Agency – Federal Grantees</td>
<td>State and local governments, including special districts, as defined under 44 CFR § 201.2.</td>
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<tr>
<td>Multi-jurisdiction planning organizations formed to develop and apply a CEDS for an EDA-approved region. This often is, but does not have to be, an EDA-designated EDD. In some states, an EDD may be a Council of Governments (COG) or other regional planning agency.</td>
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Purpose

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<thead>
<tr>
<th>CEDS</th>
<th>Hazard Mitigation Plan</th>
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<tr>
<td>A CEDS is designed to bring together the public and private sectors to create an economic roadmap to</td>
<td>The purpose of hazard mitigation planning is for state, local, tribal and territorial governments to identify the</td>
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### Comprehensive Economic Development Strategy and Hazard Mitigation Plan Alignment Resource Guide

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<thead>
<tr>
<th><strong>CEDS</strong></th>
<th><strong>Hazard Mitigation Plan</strong></th>
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<td>diversify and strengthen regional economies. The CEDS should analyze the regional economy and serve as a guide for establishing regional goals and objectives, developing and implementing a regional plan of action and identifying investment priorities and funding sources. Public and private sector partnerships are critical to the implementation of the integral elements of a CEDS. As a performance-based plan, the CEDS serves a critical role in a region’s efforts to defend against economic dislocations due to global trade, competition and other events resulting in the loss of jobs and private investment.</td>
<td>natural hazards that affect them, to identify actions and activities to reduce any losses from those hazards and to establish a coordinated process to implement the plan, taking advantage of a wide range of resources. The local mitigation plan is the representation of the jurisdiction's commitment to reduce risks from natural hazards. It serves as a guide for decision makers as they commit resources to reduce the effects of natural hazards. A local government must have an approved hazard mitigation plan to apply for and receive Hazard Mitigation Assistance project grants.</td>
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| **Update Period** | Every five years (maintained annually) | Every five years (maintained annually) |

### CEDS and Hazard Mitigation Plan Requirements and Regulatory Citations

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<tr>
<th>Requirements</th>
<th>CEDS</th>
<th>Hazard Mitigation Plan</th>
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<tr>
<td>Planning Process</td>
<td><strong>CEDS Strategy Committee</strong>&lt;br&gt;13 CFR § 303.6(b)(1)&lt;br&gt;The Planning Organization must appoint a Strategy Committee, which is responsible for the development, implementation, revision or replacement of the CEDS for the Planning Organization. The Strategy Committee must represent the main economic interests of the region, which may include Indian tribes, the private sector, state and other public officials, community leaders, private individuals, representatives of workforce development boards, institutions of higher education, minority and labor groups and others who can contribute to and benefit from improved economic development in the relevant region. In addition, the Strategy Committee must demonstrate the capacity to undertake a collaborative and effective planning process.&lt;br&gt;&lt;br&gt;<strong>CEDS public participation</strong>&lt;br&gt;13 CFR § 303.6(b)(2)&lt;br&gt;The Planning Organization must develop and submit to EDA a CEDS that complies with the requirements of § 303.7. Before submission to EDA, the Planning Organization must provide the public and appropriate governments and interest groups in the relevant region with adequate notice of and opportunity to comment on the CEDS. The comment period shall be at least 30 days and the Planning Organization shall make the CEDS readily available through appropriate means of distribution, electronically and otherwise, throughout the comment period. The Planning Organization also shall make the CEDS available in hardcopy upon request. EDA may require the Planning Organization to provide any</td>
<td><strong>Hazard mitigation planning process and public involvement</strong>&lt;br&gt;44 CFR § 201.6(b)&lt;br&gt;Planning process. An open public involvement process is essential to the development of an effective plan. In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process must include:&lt;br&gt;(1) An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval;&lt;br&gt;(2) An opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities and agencies that have the authority to regulate development, as well as businesses, academia and other private and nonprofit interests to be involved in the planning process; and&lt;br&gt;(3) Review and incorporation, if appropriate, of existing plans, studies, reports and technical information.&lt;br&gt;44 CFR § 201.6(c)(1)&lt;br&gt;[The plan must include:] documentation of the planning process used to develop the plan, including how it was prepared, who was involved in the process and how the public was involved.&lt;br&gt;44 CFR § 201.6(c)(4)(iii)&lt;br&gt;[The plan must include a plan maintenance process that includes:] discussion on how the community will continue public participation in the plan maintenance process.</td>
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<tr>
<td>Requirements</td>
<td>CEDS</td>
<td>Hazard Mitigation Plan</td>
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<tr>
<td>Plan Elements (1 – 4)</td>
<td>comments received and demonstrate how the comments were resolved.</td>
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</tr>
<tr>
<td>1. CEDS Summary Background</td>
<td>1. Hazard Mitigation Plan Community Profile</td>
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<tr>
<td>[The CEDS shall include] a summary of economic development conditions of the region.</td>
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<tr>
<td>2. SWOT Analysis</td>
<td>2. Hazard Identification and Risk Assessment</td>
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<tr>
<td>13 CFR § 303.7(b)(1)(ii)</td>
<td>44 CFR § 201.6(c)(2)</td>
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<tr>
<td>[Each CEDS must include:] an in-depth analysis of regional strengths, weaknesses, opportunities and threats.</td>
<td>The risk assessment must include:</td>
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<td>(i) A description of the type of all natural hazards that can affect the jurisdiction.</td>
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<td>(ii) A description of the jurisdiction’s vulnerability to the hazards [...]. This description must include an overall summary of each hazard and its impact on the community. [...] The plan should describe vulnerability in terms of: (A) the types and numbers of existing and future buildings, infrastructure and critical facilities located in the identified hazard areas; (B) an estimate of the potential dollar losses to vulnerable structures [...] and a description of the methodology used to prepare the estimate; (C) providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.</td>
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<tr>
<td>2. Capability Assessment</td>
<td>§ 201.6(c)(3)</td>
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<td>§ 201.6(c)(3)</td>
<td>[The plan must include] a mitigation strategy that provides the jurisdiction's blueprint for reducing the potential losses identified in the risk assessment, based on existing authorities, policies, programs and resources and its ability to expand on and improve these existing tools.</td>
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<tr>
<td>Requirements</td>
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<tr>
<td>3. Strategic Direction/Action Plan</td>
<td>13 CFR § 303.7(b)(1)(iii) [The CEDS shall include] strategies and an implementation plan to build upon the region's strengths and opportunities and resolve the weaknesses and threats facing the region, which should not be inconsistent with applicable state and local economic development or workforce development strategies.</td>
<td>3. Mitigation Strategy</td>
</tr>
<tr>
<td>4. Evaluation Framework</td>
<td>13 CFR § 303.7(b)(1)(iv) [The CEDS shall include] performance measures used to evaluate the Planning Organization's successful development and implementation of the CEDS.</td>
<td>4. Plan Maintenance</td>
</tr>
<tr>
<td>4. Adoption</td>
<td>44 CFR § 201.6(c)(5) [The CEDS shall include] strategies and an implementation plan to build upon the region's strengths and opportunities and resolve the weaknesses and threats facing the region, which should not be inconsistent with applicable state and local economic development or workforce development strategies.</td>
<td>4. Adoption</td>
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