

Hurricane Ida DRRRA Section 1206 Implementation Case Study

This study reviews the implementation of the Disaster Recovery Reform Act (DRRA) Section 1206 Policy implemented after Hurricane Ida in Louisiana (DR-4611) and shares the lessons learned for future state, local, tribal, and territorial governments looking to implement this type of project.

Background

DRRA 1206 authorizes FEMA to provide communities approved for Public Assistance (PA), under Section 406 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, with reimbursement for costs incurred for work done to administer and enforce their legally adopted building codes and floodplain management ordinances. While the provisions of this document apply only to the PA Program, assistance under Section 1206 of DRRA may be available under other FEMA programs, such as FEMA's Federal Insurance and Mitigation Administration's (FIMA's) Substantial Damage Data Collection Contracts.

Building Code and Floodplain Management Administration and Enforcement Grants Under Hurricane Ida in Louisiana (DR-4611)

After Hurricane Ida in Louisiana (DR-4611), seven projects were obligated under FEMA PA for Building Code and Floodplain Management Administration and Enforcement. The grants averaged \$1.3 million, ranging from \$78,363 to \$7,931,372, and the focus of the scopes of work were primarily concentrated on substantial damage assessments.

The largest project was for a subapplicant who utilized contract services for parish-wide structure inspections to enforce its floodplain management ordinance. The scope included inspections of approximately 18,500 buildings to support substantial damage determinations. Other projects included similar scopes of work with inspections ranging from 40 to 4,538 buildings.

FEMA PA funding for Building Code and Floodplain Management Administration and Enforcement was signed policy as of October 15, 2020, but was effective for disaster declarations on or after November 1, 2020. Hurricane Ida was an early case study to evaluate and learn about the implementation. Information was gathered from subapplicant presentations and interviews to assist communities in future disasters to obtain resources needed to increase the speed of recovery by conducting building inspections, issuing permits, and enforcing adopted building codes and floodplain ordinances.



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Lessons Learned

The following key findings and considerations are best practices for jurisdictions and communities to consider when implementing Section 1206 activities eligible for reimbursement; they do not constitute guidance.

1. Pre-Disaster Planning:

Costs associated with eligible work executed through [mutual aid agreements](#), through contractors or temporary employees, may be eligible for reimbursement. Having resources to perform post-disaster floodplain management or code enforcement tasks in place before disasters is a crucial aspect of recovery. Contracts to perform eligible work should be established and led by the local community.

Funding for initial efforts prior to receiving grants may be challenging and can impact budgets. Communities should consider the preparation required to cover initial costs.

2. Community Buy-In:

Community leaders should understand the importance of post-disaster compliance. Ensuring a whole of government approach to the understanding of recovery creates successful, compliant, and more resilient recovery outcomes. Sustained engagement and continuous interaction with and education of community leaders to emphasize the importance of National Flood Insurance Program participation contributes to these outcomes.

State Floodplain Management and FEMA Regional Offices are important resources to leverage at the local level before, during, and after a disaster.

3. Flood versus Wind Damage:

Flood damage differs from wind damage. Flood risk products can help guide efforts to evaluate likely locations of flood damage. Wind is much more variable and difficult to plan for and evaluate. Assessing wind damage from aerial photos or street-level inspections is also difficult. Even a relatively small amount of visible roof damage may not correlate to the amount of damage to the structure or its interior finishings.

4. Future Considerations:

Post-disaster assignments of key staff familiar to and/or with the community and experienced with post-disaster recovery and compliance concepts is critical to successful outcomes. Clarification of roles among deployed staff and knowledge of where to direct specific questions to provide more peer-to-peer resources and engagement opportunities is also important.

Aerial surveys may assist in conducting assessments that allow damage assessment teams to prioritize resources.

Hiring temporary staff to assist with a permit backlog and revisit the sites as needed during the permit process may be helpful.

Resources

[Section 1206 | Building Code and Floodplain Management Administration and Enforcement](#)