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Mitigation Program Reductions, the Threat and Hazard Identification Risk Assessment (THIRA), and the Rise of the National Preparedness Grant Program (NPGP)

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For those of us who believe that community sustainability and resilience depend on implementing mitigation at every opportunity, these are tough times. The latest blow to mitigation is the Federal Emergency Management Association (FEMA) FY13 budget proposal from the Administration. Not only did flood mapping, the foundation of every mitigation activity a community undertakes, see another proposed cut - but the Pre-Disaster Mitigation (PDM) program is proposed to be eliminated. While the PDM program has not been huge in dollars, between \$36-150 million per year, it has provided a cost share incentive for states and communities of all sizes to engage in mitigation efforts. If the federal government hopes for states and locals to do more mitigation, these incentives are key in leveraging a few federal dollars into effective mitigation.

The Association of State Floodplain Managers (ASFPM) has weighed in on the FEMA FY13 budget, recommending the restoration of cuts in mapping and that PDM not be eliminated. You can see ASFPM's detailed comments listed on the web via Home>National Policy and Programs>Working with Congress>Federal Budgets.

The FEMA position seems to assume that pre-disaster mitigation projects and planning will still happen per being eligible under the new combined grant program, National Preparedness Grant Program (NPGP). ASFPM has reviewed the vision and guidelines for the NPGP, and we find it difficult to believe that anything other than preparedness activities for terrorism will make it through the criteria. In further discussions with the Department of Homeland Security (DHS), it was confirmed that planning will not be eligible under NPGP and that natural hazard mitigation projects could not be funded because the grants are directed by the 911 Commission Act, which is focused on terrorism. The bottom line is that it is difficult to see how any mitigation project would have a chance of being funded using these criteria. Contrary to the DHS budget statement, PDM is still a high demand program, and this proves increasingly so as more communities gain experience with mitigation, mitigation planning, and projects.

Unfortunately, what we are seeing is a much larger effort to begin redefining priorities for the various hazards communities face, and to then associate funding priorities with these new priorities. This redefinition begins with changing the process for risk assessment. For example, the new concept that DHS and FEMA are rolling out, called the Threat and Hazard Identification Risk Assessment (THIRA), now puts "threats" on equal footing with hazards and risks. This concern is exemplified in the following comment from those supporting the new grant program in FEMA: "In the end, it should come down to the simple formula for Risk Management, where **Risk = Threat x Vulnerability x Consequences.**" However, as many of you know, the classic formula is actually **Risk = Probability x Vulnerability x Consequences.**

ASFPM submits that it is inaccurate to use "threat" in the formula, per it inserting "threat" regardless of whether it has a probability or not. Under mitigation planning, we have been doing risk assessments this way for a while now - arguably since the Disaster Mitigation Act of 2000, which used the process of Hazard Identification Risk Assessment (HIRA) absent threat. Love 'em or hate 'em, we can at least say that through a risk assessment based approach, where probabilistic determinations must be made, one can justify investments of scarce resources and it gives a solid way to identify priority funding areas. Not so, if THIRA does not attach a probability to a given threat. In fact, the THIRA guidance under the Comprehensive Preparedness Guide 201: Threat and Hazard Identification and Risk Assessment Guide (CPG 201 document) makes the following statement, "The specificity gained by complex probabilistic modeling and analysis is lost when trying to apply

the results across the complex landscape of prevention, protection, mitigation, response, and recovery.” So, if somebody deems that a threat exists, even if the probability is unable to be determined or is near zero, it has the potential to score high. Under such a scenario, certainly the greatest threat of all is a gigantic asteroid hitting the earth! Should that, then, be the funding priority? Of course not, and we specifically chose an absurd example in order to better highlight how this is the kind of lessened rigor the concept of risk assessment a THIRA introduces. It is ironic that traditional risk assessment has worked for many years to support the entire spectrum of emergency management and has worked in communities large and small. Now, suddenly, we seem to be replacing it with another model – one that is untested and unproven. The CPG 201 document goes on to say “These methodologies most often focus on a single threat or hazard type and a small area or fixed facility.” While it is true that risk assessment traditionally focuses on one hazard (although there has been much more emphasis recently on analyzing multiple hazards and cascading effects), the authors surely could not have been unaware of the risk assessments that have been part of mitigation planning and which do a credible job in covering much larger areas. Many questions remain:

- What is a “threat”? Is it anything deemed harmful to a community? CPG 201 defines a threat as “resulting from the intentional actions of an adversary.” But what are the sideboards on making that determination?
- What are we going to do with the existing risk assessments and mitigation plans? How can a THIRA inform a risk assessment for a natural hazard? FEMA informs us they are working to integrate THIRA processes with HIRA processes. But until that is done in such a way that those of us doing mitigation can better understand how it will impact all mitigation activities, many will continue to have doubts, and will be unable to support the new combined grants. It would seem important to have key processes like this available before proposing changing the existing system.
- If we throw out probabilistic modeling how do we make accurate assessments of impacts? What are the implications of having a much less disciplined approach to risk assessment?

Does the nation need to be prepared for possible terrorism? Yes, but it needs to be even more prepared to reduce its risk for natural disasters, as these reliably occur year in and year out, and in fact, almost week in and week out. America has experienced two significant terrorism events in 17 years: Oklahoma City in 1995 and September 11 in 2001, claiming a total of about 3,100 victims. However, in those same 17 years, the nation lost over 5,000 people to floods, hurricanes, and tornadoes. Furthermore, over that same time period, the nation absorbed a staggering \$455 billion in property damage losses from these natural hazards - as compared to approximately \$19 billion for the two terrorist attacks. Given that these numbers reveal natural disasters as deadlier and causing significantly more damage, what makes better sense for making Americans safer: terrorist attacks that might happen or natural hazards that will?

It is unfortunate that we have come to a “terrorism vs. natural disasters” discussion, but the loss of ability to help communities mitigate damages and loss of lives from natural disasters leaves a dilemma in our nation’s effort to reduce risk to flooding and other natural disasters. It seems to us that combing grants for both terrorism and natural hazards may not serve either one very well, and keeping them separate has value to the nation. It may be time to get back to the basics of managing emergencies. The traditional approach of emergency management, in which there was a focus on the four primary phases of *preparedness, response, recovery and mitigation*, served the nation well - especially in responding to acts of terrorism. While all four phases should be integrated, there is a core competency and capability for each that must be maintained. One phase cannot be subsumed by another.

If you have similar concerns, you may wish to weigh in with decision makers or submit comments via the FEMA Grant Programs Directorate interactive website. This can be done at: www.fema.ideascale.com. Additionally, we urge you to share your thoughts with us by sending them to asfpm@floods.org.