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U.S. Governmental Affairs Committee Chair
International Association of Emergency Managers

Before the

Subcommittee on Economic Development, Public Buildings and Emergency Management
Committee on Transportation and Infrastructure
U.S. House of Representatives

On

FEMA's Pre-Disaster Mitigation Program

April 30, 2008

Chairwoman Norton, Ranking Member Graves and distinguished members of the Subcommittee, I am Robert C. Bohlmann, the Emergency Management and Homeland Security Director for York County, Maine. I currently serve as the U.S. Government Affairs Chair of the International Association of Emergency Managers (IAEM) and am providing this testimony on their behalf. I am also a Certified Emergency Manager ® (CEM).

The International Association of Emergency Managers has over 4,200 members including emergency management professionals at the state and local government levels, tribal nations, the military, colleges and universities, private business and the nonprofit sector in the United States and in other countries. Most of our members are U.S. city and county emergency managers who perform the crucial function of coordinating and integrating the efforts at the local level to prepare for, mitigate the effects of, respond to, and recover from all types of disasters including terrorist attacks. Our membership includes emergency managers from large urban areas as well as rural areas.

Urge Reauthorization

We appreciate this opportunity to provide testimony in support of the Federal Emergency Management Agency's Pre-Disaster Mitigation (PDM) Program. We believe that PDM is an important program and urge that the Congress take quick action to reauthorize it prior to PDM's scheduled sunset on September 30, 2008. At the conclusion of these remarks, we would like to make some suggestions for improving PDM.

Established Need

An adequate level of funding is necessary to ensure the success of PDM – and we would encourage you to make sure the program is successful. The number of applications received last year would indicate there is great need and interest. It is our understanding that 43 states, one territory and five federally recognized Indian tribes submitted a total of 446 applications which included 196 for planning and 250 for projects. The 75% Federal share for these projects would have totaled over $317 million which far exceeded the approximately $52 million available last year for the competitive grant program.

We understand that there are concerns about the amounts of PDM funding from prior years that remain in the FEMA account. We also recognize that there are reasons for these amounts that are related to the process and not related to the demand for mitigation funding. The PDM process, by virtue of its nationwide and competitive nature, requires more time than most grant programs. In addition, even after a project is selected for funding, FEMA must perform various analyses and findings as required by the National Environmental Policy Act (NEPA) and other federal, state and local permits must be obtained before work can begin. We believe that the origin of the confusion regarding these funds is related specifically to the fact that even after projects are selected and the funding is dedicated, it is not yet officially obligated.

Program is an investment

IAEM members firmly believe that PDM is an investment in the community, the state, and the nation. Let me describe exactly why we think it is such a good investment.

In one area within my community, there are 14 homes that become isolated for a period of 24 to 48 hours in flooding events on an average of two to three times annually. There is no alternate way into the area to deliver emergency supplies or, frankly, respond to an emergency. A mitigation project to allow better drainage for this area – ensuring continuous access – would not only prevent the homes from being isolated, it would also provide the benefit of allowing those residents to go to their jobs and prevent them from being cut off from law enforcement, fire and emergency medical services in case of an emergency. I do not know how to place a value on these benefits.

Although we have always known the great benefit to our communities, it is hard to calculate "damages avoided." We were very pleased to see the congressionally requested report by the Multi-Hazard Mitigation Council released in December of 2005 which stated that mitigation saves society an average of four dollars for every dollar spent. The study further stated that mitigation results in significant net benefits to society as a whole—to individuals, to states and to communities—in terms of future reduced resource losses and savings to the Federal Treasury in terms of future increased tax revenues and future reduced hazard-related expenditures.

Examples of benefits

I would like to share some other examples of benefits that have accrued to communities as a result of PDM funded projects.

York Beach is an area frequented by tourists in the Town of York in my county in Maine. This area is in the process of benefiting from a PDM project that will place a gate on the ocean outfall, so that silt can not fill the catch basins. This area was especially hard hit by the Mother's Day flooding event in 2006. As a result of this PDM project, it looks like nearly 26 businesses will be able to remain open during the tourist season. This is, literally, the difference between being able to make their annual living during the 12 week tourist season or not. The construction of this project keeps 200 jobs in place in the community, and keeps the community producing tax revenues at the local and state level – as well as providing a great place to vacation during the summer!

The Town of Canton, Maine (population 1,161) located along the Androscoggin River in Oxford County flooded in 2004. Since that time, the community has been extremely active in seeking PDM grants to help deal with the repetitive flooding problems. Nearly 66 different properties have been removed from the danger of flooding in various ways – whether the homes on them were elevated above the base flood elevation, or purchased and converted to open uses, or physically relocated to areas not subject to flooding. This community has secured two PDM grants – one for $3 Million and a second for $2 Million to alleviate these problems. The truly noteworthy aspect of this project is the fact that it is overseen by a resident from the community who volunteers her time. Many times smaller communities appear to be afraid to undertake a project of this size – yet, Canton aptly demonstrates that whether the work is performed by a paid consultant or a volunteer, it is possible for literally any size of community to increase the safety and security of their residents with PDM.

The Maine coastal community of Saco has a river running through the center of the downtown area. It has also had a nearly constant flooding problem in a mid size mall and a nearby residential area. Utilizing funds from Project Impact – a precursor to the current PDM program – the community installed a 96" diameter drainage pipe approximately ¾ mile long. This relatively simple structural modification has prevented any flooding to the area even during two recent years when flooding was prevalent in other areas of the state. Some of the benefits from this project have included the fact that the business

community in Saco continues to be able operate during declared disasters – keeping residents employed and generating tax revenues. These programs have been able to make a real difference for many communities.

And, to help you understand these benefits extend beyond the borders of the great state of Maine, I would also like to share an additional example from my colleague in Sedgwick County (Wichita) Kansas. A new Emergency Operations Center was completed there about a year ago, and the increased cost of making it wind resistant was provided by a $250,000.00 PDM grant. This grant paid for the additional costs of making sure the structure complied with the wind-resistant construction standards outlined in FEMA 361. This is especially important in a state located where tornadoes are so likely to occur.

Suggestions for Improvement

We would like to suggest several possible improvements to the program. Our suggestions include:

- **Direct Application for Eligible Private Non Profits.** An eligible Private Non Profit (PNP) such as a college or a hospital can apply to the state as a subapplicant for a Hazard Mitigation Grant Program (HMGP) grant or for assistance under FEMA's public assistance program. However, for the Pre-Disaster Mitigation grant they have to find another entity such as a city or county to serve as a subapplicant on their behalf. This is an unnecessary and burdensome step. We urge the committee to work with FEMA on either a legislative change or a legislative interpretation which would allow PNPs to apply directly to the state. In many circumstances, PNPs have not been able to apply because already understaffed agencies are unwilling to serve as the subapplicant.

- **Inclusion of a Cost Escalation Factor.** An escalation factor should be allowed to cover costs of price increases. It may be 24 months or more from when a vendor estimate is obtained for a project application to the actual time of beginning construction. The State and FEMA review processes, the National Environmental Policy Act (NEPA) process, and permitting requirements extend the amount of time required before actual construction can begin. In many cases the costs escalate because of increased costs of materials. For example for hurricane shutter projects there was a significant increase in costs after the Hurricanes of 2004 and 2005.

- **Cost Benefit Analysis Simplification.** Many complain that the cost benefit analysis is too complicated.

- **More time for preparing applications.** Many of our IAEM members have expressed a desire that the amount of time available to an applicant to prepare the application should be increased. We believe that any additional time allowed to applicants in this process would result in higher quality applications for projects.

- **Streamlining overall process.** Many of our IAEM members have expressed a desire that FEMA find ways to streamline the overall application process and continue to seek ways to decrease the time from application submission to actually being able to begin a project.

In closing, we again want to emphasize to the committee that IAEM believes strongly in the PDM program and we respectfully request that it should be reauthorized, rather than allowed to sunset. In addition, we respectfully request the attention of the committee to the issue of adequately funding the program. We also respectfully offer for the committee's consideration several suggestions for improvement in the PDM program relating to eligible private, non-profit applicants, the consideration of including a cost escalation factor, simplification of the cost benefit analysis, and more time for the applicant to prepare thoughtful submissions for projects.

I would be happy to answer any questions you may have.

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