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## PUBLIC SUBMISSION

# Comment Submitted by Catherine Vass

Posted by the **Federal Emergency Management Agency** on Dec 20, 2021

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Comment

The Mitigation Grant Programs for Flood Mitigation Assistance (FMA), Building Resilient Infrastructure and Communities (BRIC) program seeks to

- Fund effective and innovative projects that will reduce risk, increase resilience, and serve as a catalyst to encourage the whole community to invest in and adopt policies related to mitigation.
- Promote partnerships
- Promote equity, including by helping members of disadvantaged groups and prioritizing 40 percent of the benefits to disadvantaged communities

Based on the inclusion of “community,” “partnerships,” and “equity” in the “guiding principles,” I respectfully submit a recommendation to require applicants and sub-applicants to BRIC and any future FMA programs to include the following in their application:

- 1) Evidence of public outreach and education on proposed mitigation activities.
- 2) Evidence of public comment on the proposed mitigation activities.
- 3) Evidence that public comments were addressed either by additional outreach/education within the community or incorporation into proposed mitigations/solutions in the application/proposal.
- 4) Evidence of diverse community representation on the team that developed the application/sub-application (e.g. requirement of at least one community member, that represents the community described as benefiting from infrastructure/flood mitigation activities, be included on the team that develops the application/sub-application).

These factors can be objectively and qualitatively reviewed by a panel. For example: the number of outreach and education activities within the community; the number of public comments received; how public/community comments are addressed in the proposal; sufficiency of the timeline provided to allow adequate notice to the community and participation in proposal development; the process used to identify and recruit community representatives; the number of community representatives on the team that developed the mitigation/solution application/sub-application to FEMA.

I am a community member that was included in conversations about a proposed flood mitigation sub-application from my county to/through my state. The county officials were not transparent about the origin of the flooding issue or the public

infrastructure contributing to the flood problem. Local/county officials provided information about the flooding issue that lacked depth or supportive scientific evidence. County officials did not invite community participation in the solutions proposed and appeared surprised when community members offered alternative solutions in public meetings. Minimal information was shared with the community about the county sub-application. Budget information shared with the community indicated that solutions were contingent on Federal funding. The budget lacked depth or creativity. For example, there were no options for phased-in solutions that might be achieved if Federal funding was not available. Local/county officials did not share the final sub-application, provided to the state for application to FEMA, with the community. The sub-application was unsuccessful and was not submitted by the state to FEMA.

Based on my experience, additional program requirements to include representatives from the community served by mitigation activities would increase the success of funding provided by future FMA and BRIC opportunities. Thank you for your work to assist communities through our nation – we appreciate it.

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