

#### 4.4 PRIORITIZING LOCAL MITIGATION FUNDING ASSISTANCE

44 CFR 201.4 (c) (4) (iii) requires states to include criteria in their mitigation plans for prioritizing communities and local jurisdictions that would receive planning and project grants under available funding programs. The criteria should include consideration for communities with the highest risks, repetitive loss properties, and most intense development pressures. The plan also needs to include a principal criterion for non-planning grants based on the extent to which benefits are maximized according to a benefit-cost review.

Demand for hazard mitigation funds usually exceeds fund availability. In the last four flood-related Presidential Declarations, available Federal mitigation funds have only met 20% of the demand on average. (DR-1805 was not listed due to the hazard was a windstorm event and also, pre-applications were not required.)

Table 4.4.a

EVENT	HMGP FUNDS REQUESTED	HMGP FUNDS AVAILABLE (FED)	DIFFERENCE
DR-1651	\$15,191,356	\$1,798,019	(\$13,393,337) (-88%)
DR-1656	\$18,166,108	\$3,411,736	(\$14,754,372) (-81%)
DR-1720	\$44,888,432	\$6,630,799	(\$38,251,633) (-85%)
DR-4002	\$15,287,118	\$5,046,137	(\$10,240,981) (-67%)
DR-4077	\$16,723,428	\$3,353,199	(\$13,370,229) (-79%)
DR-4098	\$14,077,947	\$3,704,581	(\$10,373,366) (-73%)
DR-4360	\$48,072,625	\$6,939,178 (30-day estimate)	(\$41,133,447) (-85%)

Therefore, it is important that the State of Ohio prioritize local mitigation funding assistance. Section 3.4 explains how Ohio has established both eligibility and prioritization criteria. Appendix G includes the worksheets the SHMT uses to rank project applications for funding. The final project ranking by the SHMT is also the prioritization of eligible projects for funding. The exceptions to this are under HMGP where 5% and 7% projects are funded outside of the SHMT ranking process. Projects submitted under these categories are funded in accordance with the specific priority outlined in the Administrative Plan and Mitigation Strategy for that particular event.

In the event that there is not enough funding for an eligible, high-ranking mitigation project, Mitigation Branch staff will work with the sub-applicant to refine and submit the project for consideration under another grant funding cycle or program. The Ohio EMA Mitigation Branch website contains a list of potential funding sources for hazard mitigation projects.

Although Federal planning guidance indicates criteria for local mitigation funding assistance should include consideration for communities with the highest risks, repetitive loss properties, communities with the most intense development pressures, and maximizing benefits based on a benefit-cost analysis; Ohio only considers repetitive loss and benefit-cost. For the nationally competitive grant programs, state criteria match the national ranking and evaluation criteria exactly. Doing otherwise would put Ohio projects at a competitive disadvantage as compared to other projects that used the national criteria. For HMGP and FMA, repetitive loss is considered as is benefit-cost; however, communities with the highest

risks and high development pressures are not. The reason for this is that it is assumed that almost all Ohio communities have high risk from the most serious hazards and mitigation projects are used to remedy the “already built” environment, not the developing environment, which is much better handled through appropriate codes and land use measures.

Grant applications to update LHMPs are evaluated based on the local plan expiration date and the amount of funding available. Counties with expired or soon to expire plans are prioritized higher. Ohio has always set aside up 7% of available HMGP funds to offset the cost to develop/update local mitigation plans. For the PDM program, Ohio has always provided technical assistance to local officials developing planning grant applications and submitted all eligible and complete applications for funding. Recently, due to FEMA caps on the number of PDM applications that can be submitted, Ohio compiled all of the planning grant applications into a single state application to submit to FEMA for funding.

**PRIORITIZATION OF HIGH HAZARD POTENTIAL DAM (HHPD) GRANT PROGRAM FUNDS**

In Fiscal Year 2019, FEMA announced the Rehabilitation of High Hazard Potential Dam (HHPD) Grant Program, authorized under the “Water Infrastructure Improvements for the Nation Act,” or the “WIIN Act,” on December 16, 2016, which amends the National Dam Safety Program Act (Pub. L. 92-367). It is the intention of this grant program to offer funding for dams that are “high hazard dams that pose an unacceptable risk to the public.” Ohio Department of Natural Resources, Division of Water Resources, Dams Safety Program has taken the lead on administrating this grant for the State of Ohio.

Please see below for the criteria that will be used to evaluate projects for potential grant award.

Projects submitted to be a part of the HHPD Grant will be evaluated using the Safety Level Evaluation System for Dams (SLESD), a process developed by the Dam Safety Program (DSP) Staff. SLESD uses aspects of risk assessment, risk indexing, knowledge-based expert system, and database application for measuring the safety of dams. SLESD is designed for evaluating the safety levels of high-hazard dams in Ohio and is intended to be used by an experienced engineer.

The SLESD uses data gathered in the DSP database and a system of rules embedded in the SLESD database to guide the user through analyzing a series of calculations and comparisons. These calculations and comparisons are based on the safety of the dam regarding failure due to overtopping, seepage, and structural collapse of the spillway at different flood loading conditions. Once the series of analyses are done, the system compiles matrixes that results in a score for overall safety that can be used to compare with other dams. The higher the number, the less safe the dam is considered.

See Table 4.4b for typical safety level score grouping. A more detailed description of the process can be found in Appendix I of this plan. It should be noted that this analysis only factors in the condition of the dam, it does not consider the population at risk downstream of the dam. After the SLESD is performed for dams applying to the HHPD Grant the dam safety program will utilize a system to determine the population at risk.

Table 4.4b Safety Scoring Groups	
Safety Level Score	Level of Safety
< 12	High
12-40	Moderately
40-75	Poor
>75	Very Poor

Population at risk will be determined based on the information available to the evaluating team. Typically, this will include using the inundation mapping from the Emergency Action Plan (EAP) to determine how many structures are included in the inundation area to develop an estimated population at risk.