

# 6

---

## **Local Planning Coordination and Capability Building**



Although the state is responsible for supporting local governments with mitigation planning through training, technical assistance, and, when available, funding, mitigation activities often depend on local communities. For successful mitigation, the State of Louisiana works to make sure that communities are aware of available hazard data, planning resources, and state priorities for mitigation. It is also important for locals to consider local mitigation strategies and capabilities and for the State to be aware of local priorities and local data.

Overall, this chapter addresses the following requirement per the State Mitigation Planning Policy Guide (2022):

- S13** Does the plan include a general description and analysis of the effectiveness of local government mitigation policies, programs, and capabilities? [44 CFR § 201.4(c)(3)(ii)]
- S14** Does the plan describe the process to support the development of approvable local government mitigation plans? [44 CFR §§ 201.3(c)(5) and 201.4(c)(4)(i)]
- S15** Does the plan describe the criteria for prioritizing funding? [44 CFR § 201.4(c)(4)(iii)]
- S16** Does the plan describe the process and time frame to review, coordinate, and link local mitigation plans with the state mitigation plan? [44 CFR §§ 201.3(c)(6), 201.4(c)(2)(ii), 201.4(c)(3)(iii), and 201.4(c)(4)(ii)]

## Coordination of Local Planning

During the planning process, the State Hazard Mitigation Planning Committee worked to provide an accessible and easy to use document that incorporates state and local planning goals and provides a vehicle for local and regional cooperation for effective hazard mitigation. As a first step, the project team conducted a review of the hazards covered in parish mitigation plans to ensure those were also covered in the State's plan (See Chapter 2 for summary table). Coordination efforts between the State and local parishes were then examined to include technical assistance provided by the State. The team also reviewed local mitigation capacity as well as successful mitigation projects implemented at the local level. Throughout the planning process, local risk information and local capacity



were considered to the extent possible in developing the state mitigation strategy. The State of Louisiana continues to provide support to local and tribal governments with mitigation planning efforts and project. This support includes training, technical assistance, sharing of data, and funding. As of the writing of this Plan Update, 52 (81%) of Louisiana's 64 parishes have approved mitigation plans while twelve are under revision. We have four tribal plans: Chitimacha Tribe – in St. Mary Parish, Coushatta Tribe, Jena Band of Choctaw Indians in LaSalle Parish and Tunica-Biloxi Indian Tribe. This is an increase from only two plans during the time of the 2019 Update.

## HM Kick-off meetings

From 2019 to 2023, GOHSEP conducted a series of mitigation planning meetings with jurisdictions across Louisiana. Focusing on local mitigation plan updates, these coordination meetings consisted of identifying funding for plan updates, options for plan updates, and a review of the overall planning process.

Additionally, during this timeframe, GOHSEP contractors began multiple local plan updates, beginning with kick-off meetings and multiple meetings at the local level to review risk assessments, mitigation strategies, and final draft plans.

## Local Capacity

An analysis of local mitigation capabilities reveal various existing authorities, polices and resources that reduce hazard impacts or could be used to implement hazard mitigation activities.

The following list provides a summary of the types of tools upon which Louisiana parishes rely to implement local mitigation programs.

### ▶ LOCAL PLANS

- ▶ Comprehensive / Master Plan
- ▶ Capital Improvements Plan
- ▶ Economic Development Plan
- ▶ Local Emergency Operations Plan
- ▶ Continuity of Operations Plan
- ▶ Transportation Plan
- ▶ Stormwater Management Plan
- ▶ Community Wildfire Protection Plan
- ▶ Green Infrastructure Plans
- ▶ Other plans (climate action, redevelopment, recovery, coastal zone management, species protection)



## ▶ LOCAL ORDINANCES

- ▶ Zoning Ordinance
- ▶ Subdivision Ordinance
- ▶ Floodplain Ordinance
- ▶ Natural Hazard Specific Ordinance (stormwater, steep slope, wildfire)

## ▶ OTHER

- ▶ Flood Insurance Rate Maps
- ▶ Acquisition of land for open space and public recreation uses
- ▶ Other (stormwater fees, etc.)

Despite the local mitigation tools listed here, the capacity to implement mitigation varies across Louisiana parishes and tribes. Many local entities continue to face challenges in their attempts to implement mitigation policies and programs as many do not have the necessary resources to implement certain mitigation activities. For instance, many parishes lack the time and/or expertise to carry out mitigation policies and programs. Many local municipalities have one staff member or perhaps a part-time staffer focused on the implementation of mitigation policies and programs. Some do not have staff with the required expertise to include GIS, floodplain management, planning, etc., which makes it difficult to apply for funding and/or implement mitigation tasks.

Federally recognized tribes in Louisiana include the following: Chitimacha Tribe of Louisiana, Coushatta Tribe of Louisiana, Jena Band of Choctaw Indians, and Tunica-Biloxi Indian Tribe of Louisiana. The State of Louisiana also recognizes the following tribes: Addai Caddo Tribe; Biloxi-Chitimacha Confederation of Muskogee; Choctaw-Apache Community of Ebarb; Clifton Choctaw; Four Winds Tribe Louisiana Cherokee Confederacy; Grand Caillou/Dulac Band; Isle de Jean Charles Band; Louisiana Choctaw Tribe; Pointe-Au-Chien Indian Tribe; and the United Houma Nation. The state does reach out to support tribal communities; however, only the federally recognized tribes currently have approved plans. A major challenge is the fact that only federally recognized tribes can act as state applicants; this right has not been exercised in Louisiana. Another challenge lies in the fact that the tribes that are not federally recognized must coordinate with the parishes in which they are located. The lack of resources and local politics often make coordination difficult.

These challenges continue at the local and tribal level and suggest additional support is needed from the State. Suggestions for this support include education and outreach related to funding opportunities, planning workshops, and reminders and site visits to local and tribal jurisdictions prior to plan expiration dates. Additional education and outreach efforts should concentrate on Louisiana tribes – both federally recognized, and state recognized. These efforts should be coordinated with Louisiana’s Director of Indian Affairs, as well as the tribal leaders and tribal councils, to be successful.



## Local Plan Review Process

GOHSEP continues to follow the steps listed below in its review of local plans:

- STEP 1** ▶ The initial draft of a parish or municipal plan is sent to GOHSEP for review. GOHSEP staff develop and provide parish or municipal officials with comprehensive guidance for improving the format and content of the plan.
- STEP 2** ▶ Parish or municipal officials revise the plan in accordance with GOHSEP guidance and re-submit the plan for GOHSEP review. With satisfactory revisions, GOHSEP forwards the plan, with comments, to FEMA Region VI.
- STEP 3** ▶ FEMA Region VI reviews the plan and forwards comments to GOHSEP. GOHSEP relays these new comments back to the parish or municipality. GOHSEP continues to interface with parish or municipal officials to discuss and clarify all review comments on a point-by-point basis.
- STEP 4** ▶ The parish or municipality addresses both GOHSEP and FEMA Region VI comments and revises the plan.
- STEP 5** ▶ The parish or municipality submits a revised draft to GOHSEP for review. GOHSEP staff evaluate the revisions and forward the updated plan to FEMA Region VI.
- STEP 6** ▶ FEMA Region VI reviews the revised plan, and if it addresses all comments, FEMA mails a letter stating that the plan is “approvable pending adoption” to GOHSEP and the parish or municipality. In cases where the comments were not addressed, the parish or municipality again repeats the process.
- STEP 7** ▶ All participating jurisdictions then formally adopt the plan through a Resolution.
- STEP 8** ▶ The Regional Director of FEMA Region VI officially approves the plan.

The timeframe for this review process is approximately six months. The six month timeframe does not include the time spent by parishes or municipalities revising the plans in response to GOHSEP and FEMA comments. The timeframe is also based on the following assumptions:



- ▶ **Step 1 requires approximately 45 days for State review.**
- ▶ **Step 2 requires an additional 45 days for FEMA review.**
- ▶ **After resubmitting the plan for final review, the state and FEMA are each given an additional 45-day review period.**

## Prioritizing Parish and Municipal Assistance

It is stated in CFR Section 201.4(c)(4)(iii) that the State Hazard Mitigation Plan must include “[c]riteria for prioritizing communities and local jurisdictions that would receive planning and project grants under available funding programs, which should include consideration for communities with the highest risks, repetitive loss properties, and most intense development pressures. Further, that for non-planning grants, a principal criterion for prioritizing grants shall be the extent to which benefits are maximized according to a cost benefit review of proposed projects and their associated costs.”

The sub-sections below discuss these criteria in addition to “community commitment to mitigation”. The following sections include details of how the state intends to prioritize applications for funding future planning efforts. In all cases, applicants must demonstrate that their risk is sufficient to merit grant funds, particularly when compared to the project cost, but there is often considerable uncertainty in risk determinations. Hence, the state continues to consider a variety of factors in addition to risk and benefit-cost analysis in determining its priorities for mitigation grants.

The SHMPC had multiple discussions concerning how to prioritize funding selected mitigation projects. Like the 2019 Update planning process, the committee underlined communities at highest risk as the most important priority, followed by communities with repetitive loss properties, communities undergoing development, and finally, community commitment to mitigation.

## Communities at Highest Risk

One of the primary purposes of this update is to identify the areas in Louisiana with the highest risk from natural hazards. The parishes in Louisiana have different levels of exposure and risk. In general, the state will direct mitigation grant funds to the areas with the highest risk. However, in many cases, more localized risk assessments (possibly produced in the parish and municipal mitigation planning process), as well as risk assessments and benefit-cost analyses done in support of applications, may indicate areas with high risk outside the highest-risk parishes identified in this update. The most worthwhile mitigation projects are a product of both the risk in a particular place, and the effectiveness of a project. Although risk is clearly an initial indicator of mitigation potential, the state will also carefully consider the effectiveness and cost of mitigation projects in determining funding priorities.



## Communities with Repetitive Loss Properties

The State presently considers the repetitive loss status of properties in determining the grants it will support (i.e., forward to FEMA for consideration and funding), and will continue to do so as additional grant funds are available. The FMA program mandates that grant funds are directed to NFIP repetitive loss properties, and the state will continue to comply with this requirement. The Flood Insurance Reform Act of 2004, which was signed into law by the President on June 30, 2004, requires the NFIP to provide a disincentive to property owners to live in repetitively flooded areas. Rather than continue to rebuild, the program provides repeatedly flooded homeowners assistance in either elevating or moving their homes away from floodwaters.

In addition, the Biggert-Waters Flood Insurance Reform Act of 2012 called for 25% annual increases for Severe Repetitive Loss Properties insured with subsidized rates until their premium rates are full risk premiums. The Homeowner Flood Insurance Affordability Act of 2014 later confirmed this increase.

## Communities Undergoing Development

The state will also include development as a review criterion. Parish and municipal plans should provide some indication of the implications of future development, per DMA 2000 requirements for local plans. Although development is a potential factor in any risk determination, development that occurs in accordance with current building codes, land use planning and floodplain management principles should in many cases be less vulnerable than development that pre-dates these codes and principles. However, the state is aware that increased development does cause related increases in population, impacts on infrastructure, etc., and may in some cases have adverse impacts on existing areas. These factors will continue to be carefully considered in GOHSEP reviews.

## Community Commitment to Mitigation

Additionally, the state will consider parish and municipality commitment to mitigation when prioritizing projects. The commitment to mitigation should be clear in the plans submitted by the parish and municipality in addition to participation in the Community Rating System (CRS). By demonstrating their commitment to mitigation, the parishes and municipalities will show the need for various projects. The state will consider this commitment as a final review criterion.

## Maximizing Benefits According to Benefit-Cost Review of Local Projects

Regulations for FEMA's HMA grant program state that proposed mitigation projects



must be cost effective. Under some pre-established conditions, certain projects may be exempt from this regulation. However, in most cases, projects include a benefit-cost analysis, either prior to submission to GOHSEP and FEMA for funding consideration, or during the grant evaluation process.

In most cases, grant applications either include a benefit-cost analysis, or GOHSEP or FEMA performs one in accordance with FEMA and the Louisiana Office of Management and Budgets regulations. Projects that do not achieve the required 1.0 benefit-cost ratio, and are not exempted from benefit-cost analysis, are rejected from funding consideration. This is the case for all FEMA HMA grants.

## Prioritization of Parishes to Receive HMGP Funding

GOHSEP shall submit recommendations to the Governor or his/her Designee for the use of available HMGP funds. These recommendations will include:

- ▶ **Priority for use of funds, if any**
- ▶ **Allocation of funds to parishes based on their prorated share of damages as determined by the final damage assessment figures**
- ▶ **Allocations of available funds to State and Regional Agencies**
- ▶ **Use of all available initiative funds**
- ▶ **Other priority related issues as a result of the disaster**

Funds will only be made available to those eligible applicants that have or are covered by a FEMA approved state or local mitigation plan. The parishes will submit eligible project applications to GOHSEP in prioritized order, up to the amount of their allocation. Parishes are encouraged to submit more projects than their allocation in case several projects are deemed ineligible.

## Conclusion

Since the last Plan update, through its collaboration with local municipalities and other non-governmental stakeholders, the State has successfully managed a mitigation program through ten federally declared disasters. The following are the Major Declared Disasters since 2019:

- ▶ **Louisiana Hurricane Ida (DR-4611-LA)**
- ▶ **Incident Period: August 26, 2021 - September 3, 2021**
- ▶ **Major Disaster Declaration declared on August 29, 2021**





- Louisiana Severe Storms, Tornadoes, and Flooding (DR-4606-LA)
  - ▶ Incident Period: May 17, 2021 - May 21, 2021
  - Major Disaster Declaration declared on June 2, 2021
  
- Louisiana Severe Winter Storms (DR-4590-LA)
  - ▶ Incident Period: February 11, 2021 - February 19, 2021
  - Major Disaster Declaration declared on March 9, 2021
  
- Louisiana Hurricane Zeta (DR-4577-LA)
  - ▶ Incident Period: October 26, 2020 - October 29, 2020
  - Major Disaster Declaration declared on January 12, 2021
  
- Louisiana Hurricane Delta (DR-4570-LA)
  - ▶ Incident Period: October 6, 2020 - October 10, 2020
  - Major Disaster Declaration declared on October 16, 2020
  
- Louisiana Hurricane Laura (DR-4559-LA)
  - ▶ Incident Period: August 22, 2020 - August 27, 2020
  - Major Disaster Declaration declared on August 28, 2020
  
- Louisiana Covid-19 Pandemic (DR-4484-LA)
  - ▶ Incident Period: January 20, 2020 - May 11, 2023
  - Major Disaster Declaration declared on March 24, 2020
  
- Louisiana Flooding (DR-4462-LA)
  - ▶ Incident Period: May 10, 2019 - July 24, 2019
  - Major Disaster Declaration declared on September 19, 2019
  
- Louisiana Hurricane Barry (DR-4458-LA)
  - ▶ Incident Period: July 10, 2019 - July 15, 2019
  - Major Disaster Declaration declared on August 27, 2019
  
- Louisiana Severe Storms and Tornadoes (DR-4439-LA)
  - ▶ Incident Period: April 24, 2019 - June 25, 2019
  - Major Disaster Declaration declared on June 3, 2019

Simultaneously, Louisiana's mitigation capacity allowed GOHSEP, with local support, to continue to address repetitive loss properties through funding of numerous mitigation projects across all FEMA's HMA portfolio of federal funding programs. However, considering the high numbers of repetitive loss that continue to impact our local communities, these properties should remain a priority for mitigation funding. GOHSEP is currently working with FEMA to update the repetitive loss data and will provide updates across implementation cycles of projects.



During the last Plan Update, a Loss Strategy was developed for the State. The intention is for the State to update this Strategy in 2024.

Overall, coordination between the State and local communities informs and influences the state's risk assessment and mitigation priorities. This mutual understanding between states and local governments allows for a more efficient planning review and approval process, better aligns mitigation strategies and plans, and directs available resources toward effective mitigation planning statewide.

