

# FEMA Public Assistance – 406

## Mitigation: Public Buildings and Contents (Category E)

### DR-4856-CA

#### 406 Mitigation Examples

##### Elevate or Floodproof Structures

- Including installing flood barriers paired with nature-based solutions like rain gardens or permeable pavements to divert water.

##### Dry floodproofing

- Including both damaged and undamaged buildings that contain components of a systems that are functionally interdependent (i.e., when the entire system is jeopardized if any one component of the system fails).

##### Improve Connections

- To ensure a continuous load path from the roof to the foundation include roof sheathing, roof-to-wall, wall-to-wall, and wall-to-foundation connections.

##### Roofs

- Install secondary water barriers to provide extra protection, secure equipment to resist design wind loads.

##### Improve Siding

- For both wind and fire resistance with stronger attachments to the structure.

##### Non-Combustible Materials

- Replace and upgrade construction materials with non-combustible alternatives (fire resistant materials) for facilities with wildfire risk.

#### Background and Purpose

FEMA's Public Assistance (PA) program, under **Category E** (Public Buildings and Contents), addresses damage to public buildings and their contents due to disasters. This includes structural, non-structural, and mechanical, electrical, and plumbing (MEP) systems.

#### Core Mitigation Themes for Category E (Public Buildings and Contents)

- **Mitigation Objective:** To help communities restore public facilities and enhance their resilience to future disasters. Public buildings can be designed to withstand various natural hazards. While no building will remain completely undamaged, effective design will minimize the impact of significant natural events or a series of smaller ones.
- **Strengthen whole building envelope:** Evaluate the damaged portion of the structure and mitigate walls, openings, roof, and minor structures to increase the resilience of the structure. Non-damaged areas can be included in mitigation on a case-by-case basis.
- **Other Hazards:** PAPPG V5.0 allows for the inclusion of mitigation for other hazards besides the disaster hazard. This can be leveraged for assets to assess seismic, flood, wind, fire, and other hazard risks.

#### Common Pitfalls for Category E (Public Buildings and Contents)

- **Disaster-Related Damage:** Detailed maintenance records and proof of stabilization post disaster are import to show the need for disaster related repairs and mitigation.
- **Engineering:** All proposed mitigation activities must be designed or certified by a registered design professional.
- **Insurance:** Mitigation measures can be incorporated into the insurance repair process and can be implement by contractors paid for by the insurer. The mitigation measures should be billed separately from insurance costs.

## Practical Tips for Success

### Document Pre-Disaster Condition

- Photos, inspection reports, maintenance records all help confirm which damages are disaster-related vs. pre-existing.

### Scope of Work Clarity

- Separate the repair scope from 406 mitigation scope in your project description.
- Provide necessary engineering or hydrological studies for any capacity changes.

### Cost Effectiveness & Reasonableness

- Use Appendix J measures if possible.
- If not in Appendix J, do a short BCA or coordinate with FEMA on cost-effectiveness.

### Ask Early, Ask Often

- If you think an improvement qualifies as 406 mitigation, flag it to your FEMA/Cal OES PA contacts right away.

### Funding Eligibility Dates

- January 8, 2025 – Major Disaster Declaration (DR-4856-CA)
- January 15, 2025 – Public Assistance Categories C-G Approved (permanent work)
- July 8, 2026 – 18 Month Permanent Work Deadline

### Resources

- Public Assistance Program & Policy Guide-PAPPG v5 effective January 6, 2025
  - **Category E:** Pgs. 196-202
  - **Appendix J.III. Mechanical, Electrical, Plumbing Components:** Pg. 316
  - **Appendix J.VII. Buildings and Structures:** Pg. 317-318
  - **Appendix J.IX. Signage:** Pg. 318
- Building Code and Floodplain Administration and Enforcement- FEMA Policy FP 204-079-01
- Public Assistance Companion Guide- Disaster Recovery Reform Act: Section 1206

### Contact Us

Cal OES Public Assistance: [disasterrecovery@caloes.ca.gov](mailto:disasterrecovery@caloes.ca.gov)

## 406 Mitigation Process Timeline

### 1. Initial Damage

**Assessment:** Inspect damaged areas and document disaster-related damage with photos, inspection reports, and maintenance records.

**2. Project Planning:** Define Scope of Work (SOW) for repairs and identify potential mitigation measures.

Select mitigation strategies like culvert upsizing or slope stabilization.

**3. Application Preparation:** Complete FEMA PA forms and compile all necessary documents, such as damage assessments, engineering plans, and cost estimates.

**4. Submission & Review:** Submit application by deadline; FEMA reviews for eligibility and compliance.

**5. Approval & Funding:** Receive funding allocation for approved repairs and mitigation activities.

**6. Project Implementation:** Begin repairs and mitigation while adhering to approved plans.

**7. Monitoring & Reporting:** Track progress and submit regular updates to FEMA/Cal OES.

**8. Project Closeout:** Conduct final inspections and submit final documents for reimbursement and closeout.