

FEMA Public Assistance – 406

Mitigation: Utilities (Category F)

DR-4856-CA

406 Mitigation Examples

Flexible/Ductile pipe connections or replacement

- Install pipe join restraints, flexible piping at pipe/conduit connections, or replace pipes with more ductile material.

Sewer Covers

- Install devices to prevent infiltration into access holes as cast-iron water-tight frames and covers.

Pumps

- IF damaged by stormwater inundation, replace with submersible or inline pumps as appropriate.

Disconnects and shut-off valves

- Install self-initiating disconnects and shut-off valves between tanks and distribution lines to minimize damage and leaks.

Anchoring Storage Tanks

- Protect from movement by strengthening or stiffening base connections.

Redundancies

- Provide looped distribution service or other redundancies in the electrical service to critical facilities.

Power Poles

- Replace damaged poles with high-rated poles, strengthen lateral support, add cross-bracing or additional support to power lines or provide additional strength.

Background & Purpose

FEMA's Public Assistance (PA) program under **Category F** (Utilities) addresses damages to utility infrastructures, including water distribution, power utilities, natural gas, sewer systems, and communication facilities. This covers water treatment plants, power transmission and distribution, and includes facilities like wind turbines, generators, substations, solar installations, and sewer treatment plants.

Core Mitigation Themes for Category F (Utilities)

- **Mitigation Objective:** Address future damages from natural disasters that render critical services unreliable, reduce loss of function and take steps to prevent or minimize damage to these infrastructures.
- **Systematic Mitigation:** FEMA will fund mitigation activities for non-damaged elements if it is in the furtherance of mitigation a damaged system. Utility systems are receptive to systematic mitigation strategies.
- **Loss of Function:** Benefits of mitigation for utility projects is based on predetermined FEMA loss of function values per person per day. Applicants should track loss of function of utility systems to bolster potential benefit-cost analysis for mitigation.
- **Equipment Replacement:** Mitigation is not intended to replace equipment that is failing due end of useful life. Mitigation of equipment is intended for increasing capacity or level of protection.

Common Pitfalls for Category F (Utilities)

- **Legal Responsibility:** Must be an eligible applicant that has legal responsibility over the utility.
- **Disaster-Related Damage:** Utilities necessitate detailed maintenance reports to identify damages and differentiate them from deferred maintenance.
- **Temporary vs Permanent Work:** Mitigation is only applicable to permanent work; it should not be included in emergency or temporary repairs.
- **Early Implementation of Permanent Work:** Implementing permanent work repairs before evaluating mitigation can preclude full reimbursement opportunities under PA.

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 F:** Pgs. 202-205
 - **Appendix J.IV. Pipes:** Pg. 316
 - **Appendix J.V. Water/Wastewater:** Pg. 316
 - **Appendix J.VI. Electric Power Systems:** Pgs. 316-317
 - **Appendix J.VII. Storage Tanks:** Pg. 317
- 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

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.