

ARAPAHOE COUNTY IMPACT REPORT
FEMA REVIEW COUNCIL FINAL
(May 2026)

Executive Summary

Projected County PA Indicator (per capita): \$7.46 — derived by applying the state proportional increase (from \$1.89 to \$2.99, ratio 1.5820×) to the current county indicator ($\$4.72 \times 1.5820 \approx \7.46).^{1,2,3,4,6,7}

Projected Arapahoe County PA Damage Threshold (proxy): $\approx \$5.03\text{M}$, using the 2025 population estimate 673,820 as the planning basis.^{4,5}

Calculation: $673,820 \times \$7.46 \approx \$5,026,665 \rightarrow \approx \5.03M .^{5,6}

Bottom line: The bar for county-level damages before federal PA support is likely to rise substantially, reinforcing the FEMA Review Council's SLTT led doctrine (locally executed, state/tribe-managed, federally supported). Arapahoe County should expect more state/local only events, greater reliance on mutual aid, and increased local administrative responsibility under RAPID, FAIR, and R3P.¹

FEMA 2026 Framework (County-Relevant Impacts)

Public Assistance (PA) → RAPID (Direct, Parametric Funding)

- Fast cash: State receives direct funding within 30 days of a presidential declaration via parametric triggers (e.g., wind speed, flood depth).¹
- Administration shifts local: State manages eligibility, environmental/historic review (EHP), and procurement using state-certified processes, with two-phase audits (1-year reconciliation + final closeout) and an 8-year completion deadline.¹
- Performance-based federal share: 50–75% based on state performance criteria; legacy disasters may be converted to RAPID.¹

Individual Assistance (IA) → FAIR (Single Direct Payment)

- Homeowners: Direct payment up to 15% of local assessed value (implied cap \$150k), 75% federal / 25% SLTT cost share.¹
- Renters: 3 months HUD FMR (+3 optional months), same cost share; SLTT assumes mass care and non-congregate sheltering; target 30-day damage assessments.¹

Hazard Mitigation → R3P (Two-Phase, State-Managed)

- Rapid Mitigation Advance (≤30 days): Up to 5% for immediate residential mitigation; Strategic Mitigation Allocation (≤6 months): Up to 10% for RL/SRL properties and critical infrastructure.¹
- Completion ≤8 years; state administered EHP; performance incentives and audit alignment.¹

NFIP / CRS Modernization

- Continue Risk Rating 2.0, modernize flood maps/data, monitor Write Your Own (WYO) insurance policy compensation, explore NFIP depopulation (“take out”) and marketplace; local land-use and building standards grow in importance; CRS credits align to physical risk reduction outcomes.¹

Arapahoe County OEM Structure & Governance

- The Arapahoe County EOP (latest adopted July 8, 2025, under RES 25-159) uses a public base plan with internal annexes containing operational/PII data; this structure supports SLTT led operations.^{2,7}
- ESF-3 (Public Works & Engineering) annexes remain secure/internal for accreditation use; this confirms the County’s public-vs-private plan posture.^{2,7}

Implication: OEM’s ESF backbone fits the SLTT doctrine but now requires stronger audit/EHP capacity, typed/credentialed resources, and sheltering readiness to execute RAPID, FAIR, and R3P effectively.¹

Integrating the ESU Staff Study (OEM 2026)

- The Emergency Services Unit (ESU) Establishment – Staff Study.” The ESU stands up typed, mission ready capabilities to absorb workloads shifted from federal to SLTT, aligned to RAPID/FAIR/R3P.^{3,8}
- Operational lanes: Wildland Fire/HazMat/Winter Ops with embedded GIS and rapid damage assessment (30-day FAIR target).
- Administrative lanes: current workloads in addition to the new audit-ready project accounting and other workflows required under (RAPID/FAIR/R3P).^{3,8}
- POETE alignment: OEM retains planning/EOC coordination; ESU delivers typed/credentialed mission-ready packages for SLTT execution.^{3,8}

Updated Indicators & Thresholds (for Planning & Briefings)

- State PA indicator increases (reference): \$1.89 → \$2.99; ratio 1.5820×.^{1,7 14}
- Current county indicator (reference): \$4.72.^{6, 2,3,4}
- Projected new county indicator (proportional method): $\$4.72 \times 1.5820 \approx \7.46 . (This assumes FEMA applies the same proportional adjustment at the county level.)^{1,2,3,4}
- 2025 population basis (Arapahoe County): 673,820.^{4,5,6}
- Projected county damage threshold (proxy): $673,820 \times \$7.46 \approx \$5,026,665 \rightarrow \approx \$5.03M$.⁴

Use in practice: These numbers do not change statutory rules for declarations (evaluated primarily at the state level), but they help OEM set EOC activation posture, mutual-aid triggers, and finance communications (“Is this event likely to be federal PA eligible?”).¹

Likely Operational Implications for Arapahoe County

Finance & Audits (RAPID/FAIR)

- Publish a RAPID/FAIR audit playbook (1-year reconciliation + final closeout); embed project accounting by department; train PMs/Finance to support state run audits.^{1 1}

Local EHP & Procurement

- Update local EHP SOPs and procurement to state standards; prequalify vendors to meet 30 day/6-month timelines without federal bottlenecks.¹

Sheltering / Temporary Housing

- Expand MOUs for congregate/non-congregate sheltering (ARC/VOAD/hotels); build rapid intake and case coordination; align ESU/GIS workflows to 30-day damage assessment expectations.^{1,3,18}

Mitigation Pipeline (R3P)

- Develop shovel-ready project list; maintain RL/SRL inventories; ensure funds management systems meet state audit criteria. Use existing HMP trackers to operationalize project readiness:

–For instance, the [Arapahoe_County_Mitigation_Action_Tracker_2025](#) ^{8 9 10 11}

NFIP/CRS & Land Use

- Coordinate with Flood Plain Administrators to update ordinances, risk communication, and CRS credit strategies aligned to physical risk reductions and RR2.0 realities.¹

Preparedness, Resource Typing, Credentialing

- Ensure ESU/OEM teams are typed and credentialed; submit capabilities to state/national resource catalogs (mission ready). Reinforce ESF responsibilities with department directors via annual memos (existing OEM pattern confirmed through EOP/posture).^{2, 3 7 8}

Footnotes

1. FEMA Review Council Final Report (May 7, 2026): RAPID/FAIR/R3P design, SLTT-led doctrine, NFIP/CRS modernization, admin cost and workforce posture.

2. EOP adoption and posture (RES 25-159; base plan public, annexes internal)

3. ESU Staff Study: “Emergency Services Unit (ESU) Establishment – Staff Study” (OEM 2026).

4. U.S. Census QuickFacts (Arapahoe County population 2025 estimate).

5. FRED Census series (Arapahoe County population 2025 annual).

6. FEMA Countywide PA indicator \$4.72 (effective for incident start dates on/after Oct 1, 2024): Federal Register Notice (Docket FEMA-2024-0001).

7. Threshold references (state \$1.89; county \$4.72) for the current cycle: VLCT guidance page.

8. HMP mitigation trackers: [Arapahoe_County_Mitigation_Action_Tracker_2025.xlsx](#); [AC VER 2.xlsx](#)

9. HMP Stakeholder List (cross-functional County/city partners)

10. [Resources/fema_hma-program-policy-guide_032023.pdf](#)

11. Arapahoe County HMP 20111025

13. Arapahoe County HIRA20081825

14. FEMA tcl.pdf