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Comment Submitted by Utah Division of Emergency Management

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[Docket \(/docket/FEMA-2025-0278\)](#) / [Document \(FEMA-2025-0278-0001\) \(/document/FEMA-2025-0278-0001\)](#) / [Comment](#)

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Thank you for providing the opportunity to provide comments on the THIRA and SPR process.

While the need for a comprehensive threat assessment and capability assessment exists, the current process and methodology used by FEMA has provided complications and uneven reporting in our jurisdiction. We have found that the data and information collected in the current THIRA and SPR process provides little applicable value to state and local stakeholders.

Utah's topography, population, and general disaster threats and hazards are vastly different, even for jurisdictions that are only an hour's drive away. As part of the THIRA process, theoretical scenarios are used to measure a capability target and current capability. However, it is nearly impossible to have realistic scenarios that effectively capture the unique circumstances of every jurisdiction in Utah.

Additionally, stakeholders have also expressed concern over the capability target and current capability measurements. Utah's 'worst-case' scenario would be a large earthquake across the Wasatch Fault. Utah has not to date had an earthquake of that magnitude in such a populated area. Current data and tools can give an estimate of what may happen, but there is no measurable data or past experience to allow stakeholders to come up with a meaningful capability target to measure against. Many stakeholders have expressed concern with the scenario-based type of reporting, citing that it feels they are just guessing numbers without past data to compare against.

We recognize the importance of conducting meaningful capability assessments to help our jurisdictions understand their capabilities and improve upon them. However, because the current THIRA and SPR processes do not meet our state's needs, we have implemented a locally based assessment called the Utah Community Emergency Preparedness Assessment (UCEPA), similar to the programs utilized by New York State and Colorado State. We have found that this process greatly benefits our local jurisdictions by giving them meaningful data focused on capabilities for their individualized circumstances. We have also been working to integrate a similar UCEPA process to the state agency level, where the data can be more easily tracked and trends monitored over several years.

We appreciate the opportunity to provide comments on the THIRA and SPR process. We would be happy to discuss with FEMA any further questions about our processes for capability assessments.

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