

GUIDANCE MEMORANDUM #3



Plan Integration

To: Ed Conover
Atlantic County Office of Emergency Preparedness
For distribution to representatives from all participating jurisdictions

From: Anna Foley, URS

Date: January 6, 2009

Re: Atlantic County Multi-Jurisdictional Hazard Mitigation Planning Project

DMA 2000:

The Disaster Mitigation Act of 2000 (DMA 2000), also known as Public Law 106-390, amends the Robert T. Stafford Disaster Relief and Emergency Assistance Act by, among other things, adding a new section, 322 - Mitigation Planning. It contains 44 CFR Part 201.6(c)(4)(ii) which states, "[The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate." To meet this requirement, the new Hazard Mitigation Plan should indicate how mitigation recommendations will be integrated into job descriptions, or existing planning mechanisms such as comprehensive plans, capital improvement plans, zoning and building codes, site reviews, permitting and other planning tools, where such tools are appropriate.

Memo Purpose:

This memorandum aims to present a summary of some key information that is presented in FEMA's How-To Guide #4 entitled "Bringing the Plan to Life: Implementing the Hazard Mitigation Plan" (available online at: <http://www.fema.gov/plan/mitplanning/howto4.shtm>) regarding Plan Integration (see Task B in Chapter 2). It is intended to serve as a supplement – and not as a replacement – for the FEMA documents. URS would strongly suggest that the Planning Group members make every effort to familiarize themselves with applicable FEMA regulations and mitigation planning guidance (see "Sources of Information on Hazard Mitigation on Planning" handout from Core Planning Group Meeting #1 on August 18, 2008).

Keep In Mind:

URS Corporation (URS), as the consulting company, is able to provide the Planning Group with guidance on potential means to satisfy the requirement for plan integration procedures. However, it is Atlantic County and the participating jurisdictions that are in the best position to define the process. The Core Planning Group must coordinate amongst themselves to consider URS' recommendations herein and agree upon a plan integration procedure for the County's Multi-Jurisdictional Plan, to be provided back to URS in order for URS to incorporate this information into the plan. URS will incorporate the plan integration procedures, obtained from the Core Planning Group through ACOEP, into the new Hazard Mitigation Plan.



Action Items:

Action items are discussed further throughout this memorandum. They are presented in summary here. To allow URS sufficient time to draft appropriate plan sections, the Planning Group must:

- Submit comments to ACOEP regarding what your community is in favor of, and/or what your community opposes, regarding plan integration. **Comments should be submitted to Ed Conover no later than February 7, 2009. Feedback is not required; lack of response will be interpreted to indicate that your jurisdiction has no particular preferences regarding this plan element.**



Section 1 – Implementation Through Existing Planning Mechanisms

The Regulations: 44 CFR Part 201.6(c)(4)(ii) which states, “[The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate.”

To meet this requirement, the new Hazard Mitigation Plan should indicate how mitigation recommendations will be integrated into job descriptions, or existing planning mechanisms such as comprehensive plans, capital improvement plans, zoning and building codes, site reviews, permitting and other planning tools, where such tools are appropriate. In other words, “plan integration” can be thought of as the process whereby each local government will incorporate the plan findings and projects into their governing systems.

In the process of fulfilling the necessary requirements mandated in DMA 2000, URS suggests that the subsequent questions be addressed:

1. Does the plan identify other local planning mechanisms available for incorporating the requirements of the mitigation plan?
2. Does the plan include a process by which the local government will incorporate the requirements in other plans, when appropriate?

URS suggests that the Core Planning Group facilitate its duties by using existing processes and resources while implementing the plan and fulfilling the mitigation goals. An important step in any mitigation implementation process is to take advantage of tools and procedures that are already in place. Because the mechanisms are in-place and familiar to local officials, tapping into existing resources will alleviate the workload and accelerate the implementation process, particularly if the implementation phase calls for expanding existing agency mandates or departmental funds, for instance, or creating new programs later on.

By completing the previously-distributed Capability Assessment Questionnaires, each participating jurisdiction should have a clear understanding of their unique local capabilities and resources.

The following bullets excerpted from the FEMA How-To provide ways that the hazard mitigation plan can be integrated into local planning mechanisms:

- **Departmental or organizational work plans, policy, and procedural changes.** Updating the work plans, policies, or procedures to include hazard mitigation concepts and activities can help integrate the plan into daily operations. These changes can include how major development projects and subdivision reviews are addressed in hazard-prone areas or ensure that hazard mitigation concerns are considered in the approval of major capital improvement projects. Plan integration strategies could include:
 - In participating jurisdictions where Master Plans, General or Comprehensive Plans exist, Planning Group members will work with their respective planning departments to educate them on the Hazard Mitigation Plan and encourage that on the next updates of such plans, hazard mitigation for natural hazards is addressed.
 - Many participating jurisdictions have local building departments responsible for building code enforcement and review of site plans. Local jurisdictions enforce the state-adopted IBC. In these



communities, Planning Group Members can coordinate with their respective building departments to ensure that they have adopted and are enforcing the minimum standards established in the State-adopted IBC.

- Many participating jurisdictions participate in FEMA's National Flood Insurance Program and as such have local floodplain management ordinances. In these communities, Planning Group Members can coordinate with their respective Floodplain Administrator to determine if enforcement beyond FEMA minimum requirements would be prudent for the community.
 - In participating jurisdictions with local zoning ordinances, Planning Group members can work with their zoning boards to educate them on the Hazard Mitigation Plan and encourage consideration of low occupancy, low-density zoning in hazard areas, when practicable.
- **Job descriptions.** Working with department or agency heads to revise job descriptions of government staff to include mitigation-related duties could further institutionalize hazard mitigation. This change would not necessarily result in great financial expenditures or programmatic changes. For example, the How-To presents the following language which could be considered for adding into job descriptions for a community planner, floodplain manager, emergency manager, building code official, or water resources engineer in the Public Works Department:

Knowledge, Skills and Abilities

- Knowledge.** Knowledge of the principles of emergency management, specifically hazard mitigation. Knowledge of the principles and practices of sustainable development and how it is incorporated into hazard mitigation planning. Knowledge of FEMA's pre- and post-disaster mitigation programs, as well as other federal agency programs (HUD, EPA, SBA) that provide technical and/or financial assistance for implementing pre- or post-disaster mitigation planning. Knowledge of private/non-governmental programs that can support reconstruction and mitigation strategies.*
- Skills.** Consensus building and team building, communication (verbal and written), and interpersonal skills.*
- Abilities.** Ability to apply planning principles and tools to the goals of hazard loss reduction.*

- **Capital and operational budgets.** Instead of solely relying on funding from hazard mitigation programs or other external sources of grant monies, jurisdictions might consider a line item for mitigation project funding in their capital or operational budgets. Having a line item in these budgets may not guarantee funding every year, but it is certainly easier to get the money allocated if it is already there. Examples include:
 - A revolving fund to finance a buyout program.
 - A low-interest loan program to fund retrofits.
- **Executive Orders, ordinances, and other directives.** The governing body or local executive often has the authority to issue directives to require departments and agencies to carry out certain hazard mitigation actions. Using one of these mechanisms, the governing body or executive can direct department heads to provide progress reports to the planning team on the hazard mitigation initiatives that the departments are responsible for carrying out.
- **Comprehensive planning.** Adding a hazard element to the comprehensive plan is one of the most effective mechanisms to institutionalize hazard mitigation for new construction. A primary benefit of combining these processes is that they both influence the location, type, and characteristics of physical growth, specifically buildings and infrastructure. While planning in and of itself may not be regulatory, it uses regulatory mechanisms (zoning, development ordinances, etc.) for implementing goals and objectives.



Additionally, in many parts of the country, the comprehensive planning process is an established activity that is already familiar to the public, and it usually generates a great deal of interest and public participation.

Examples of using existing resources to accomplish mitigation, as excerpted from FEMA's How-To #4, include:

- The Department of Public Works could adopt more rigorous procedures for inspecting and cleaning debris from streams and ditches. Instead of cleaning only after storms or complaints from citizens, the Department could require inspections of streams and ditches at least semi-annually.
- The Planning Department could add hazard vulnerability to subdivision and site plan review criteria and incorporate any necessary actions at the planning stage.
- A Community conservation society or other interested voluntary organization could perform inventories of historic sites in hazard areas that might require special treatment to protect them from specific hazards.
- Partners and nonprofit organizations and businesses can assist the planning team in a number of ways, by including lending expertise, discounted materials, staff or volunteer time, or meeting space. The planning team can in response offer these entities opportunities for greater public exposure and thus, greater recognition. The planning team can inform partners about the hazards they potentially face the ways they can mitigate these hazards and how their staff can mitigate hazards at home.
- Citizens have an ongoing role to play in project implementation. The planning team should actively seek volunteers to help implement programs and activities. Knowledgeable citizens can also be recruited to provide expertise in specific subject areas. The more the team involves people in implementing the plan, the greater the support it will receive.
- State agencies can lend their time, expertise and funds to the implementation of hazard mitigation projects. Make sure the planning team's list of state contacts is very broad, as the resources of one state agency may be unknown to another.
- Colleges and universities can provide technical expertise to projects that may require Geographic Information System (GIS), engineering, planning or other technical assistance. They can also provide meeting space, laboratories and other logistical support.
- Community libraries are an excellent source of information and services, including volunteers.

Section 2 –Draft Text For Your Review/Comment

The text below represents a draft section for the Atlantic County plan regarding plan integration. **Please comment on anything your jurisdiction would like to see changed in the final Atlantic County Plan.**

As per 44 CFR Part 201.6(c)(4)(ii), "[The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate."

URS Corporation (URS), as the consulting company, was able to provide the Planning Group with guidance on potential means to satisfy the requirement for plan integration procedures. However, it was the members of the Core Planning Group who were in the best position to define the process. URS submitted a Guidance Memorandum (Guidance Memorandum #3 – Plan Integration) to ACOEP on January 6, 2009, to summarize FEMA requirements for integrating the plan into other local planning mechanisms. It was also posted to the mitigation planning web site soon after for review by Core Planning Group members, the public, and other stakeholders.



Team members were asked to provide feedback regarding their desires for plan integration to ACOEP. ACOEP, in turn, worked with the Consultant to develop this mitigation strategy to best reflect expressed preferences. The information presented below represents these decisions, as provided to URS through ACOEP. These methods will ensure that regular integration of the Hazard Mitigation Plan will occur.

ACOEP, with input from URS and the Core Planning Group member feedback, noted the following capabilities in relation to mitigation planning and opportunities to integrate the mitigation plan into daily activities. Progress with regard to Plan Integration will be on the agenda for each Annual Plan Evaluation Meetings.

Participating jurisdictions currently use comprehensive land use planning, capital improvements planning and building codes to guide and control development. After the Hazard Mitigation Plan is formally adopted, these existing mechanisms will have hazard mitigation strategies integrated into them, as follows:

- Within six months after adoption of the Hazard Mitigation Plan, Core Planning Group members for each participating jurisdiction will issue a letter to each of its community's department heads to solicit their support and explore opportunities for integrating hazard mitigation planning objectives into their daily activities. Specifically, letters can include:
 - Many participating jurisdictions have Master Plans, General or Comprehensive Plans. In participating jurisdictions where Master Plans, General or Comprehensive Plans exist, Core Planning Group members will work with their respective planning departments to educate them on the Hazard Mitigation Plan and encourage that on the next updates of such plans, hazard mitigation for natural hazards is addressed.
 - Many participating jurisdictions have local building departments responsible for building code enforcement and review of site plans. Local jurisdictions enforce the state-adopted IBC. In these communities, Core Planning Group Members can coordinate with their respective building departments to ensure that they have adopted and are enforcing the minimum standards established in the State-adopted IBC.
 - Many participating jurisdictions participate in FEMA's National Flood Insurance Program and as such have local floodplain management ordinances. In these communities, Core Planning Group Members can coordinate with their respective Floodplain Administrator to determine if enforcement beyond FEMA minimum requirements would be prudent for the community.
 - In participating jurisdictions with local zoning ordinances, Core Planning Group members can work with their zoning boards to educate them on the Hazard Mitigation Plan and encourage consideration of low occupancy, low-density zoning in hazard areas, when practicable.
- Participating jurisdictions will consider working with their department or agency heads to revise job descriptions of government staff to include mitigation-related duties could further institutionalize hazard mitigation. This change would not necessarily result in great financial expenditures or programmatic changes. For example, the How-To presents the following language which could be considered for adding into job descriptions for a community planner, floodplain manager, emergency manager, building code official, or water resources engineer in the Public Works Department:

Knowledge, Skills and Abilities

- Knowledge.** Knowledge of the principles of emergency management, specifically hazard mitigation. Knowledge of the principles and practices of sustainable development and how it is incorporated into hazard mitigation planning. Knowledge of FEMA's pre- and post-disaster mitigation programs, as well as other federal agency programs (HUD, EPA, SBA) that provide technical and/or financial assistance for implementing pre- or post-disaster mitigation planning. Knowledge of private/non-governmental programs that can support reconstruction and mitigation strategies.
- Skills.** Consensus building and team building, communication (verbal and written), and interpersonal skills.
- Abilities.** Ability to apply planning principles and tools to the goals of hazard loss reduction.



- *Instead of solely relying on funding from hazard mitigation programs or other external sources of grant monies, participating jurisdictions will consider a line item for mitigation project funding in their capital or operational budgets. Having a line item in these budgets may not guarantee funding every year, but it is certainly easier to get the money allocated if it is already there. Examples include:*
 - *A revolving fund to finance a buyout program.*
 - *A low-interest loan program to fund retrofits.*
- *Participating jurisdictions with comprehensive plans will add a hazard element to the comprehensive plan as one of the most effective mechanisms to institutionalize hazard mitigation for new construction. A primary benefit of combining these processes is that they both influence the location, type, and characteristics of physical growth, specifically buildings and infrastructure. While planning in and of itself may not be regulatory, it uses regulatory mechanisms (zoning, development ordinances, etc.) for implementing goals and objectives. Additionally, in many parts of the country, the comprehensive planning process is an established activity that is already familiar to the public, and it usually generates a great deal of interest and public participation.*

Examples of using existing resources to accomplish mitigation, as excerpted from FEMA's How-To #4, include:

- *Core Planning Group members will work with their local Department of Public Works to adopt more rigorous procedures for inspecting and cleaning debris from streams, ditches, and storm drain systems. For example, instead of cleaning only after storms or complaints from citizens, or on an annual basis, the Department could require inspections of streams and ditches at least twice per year and after a significant rain event.*
- *Participating jurisdictions will seek to add hazard vulnerability to subdivision and site plan review criteria and incorporate any necessary actions at the planning stage.*
- *ACOEP will seek to identify a community conservation society or other interested voluntary organization could perform inventories of historic sites in hazard areas that might require special treatment to protect them from specific hazards.*
- *Partners and nonprofit organizations and businesses can assist the planning team in a number of ways, by including lending expertise, discounted materials, staff or volunteer time, or meeting space. The planning team can in response offer these entities opportunities for greater public exposure and thus, greater recognition. The planning team can inform partners about the hazards they potentially face the ways they can mitigate these hazards and how their staff can mitigate hazards at home. Participating jurisdictions will reach out to partner groups in their communities to identify those who may be willing to donate goods or services and create a database of contact information and indicated goods/services.*
- *Citizens have an ongoing role to play in project implementation. The planning team should actively seek volunteers to help implement programs and activities. Knowledgeable citizens can also be recruited to provide expertise in specific subject areas. The more the team involves people in implementing the plan, the greater the support it will receive.*
- *State agencies can lend their time, expertise and funds to the implementation of hazard mitigation projects. ACOEP will make sure the planning team's list of state contacts is very broad, as the resources of one state agency may be unknown to another. ACOEP will assist participating jurisdictions in reaching out to state agencies for support.*
- *Colleges and universities can provide technical expertise to projects that may require Geographic Information System (GIS), engineering, planning or other technical assistance. They can also provide meeting space, laboratories and other logistical support. ACOEP will assist participating jurisdictions in reaching out to educational institutions for support.*
- *Community libraries are an excellent source of information and services, including volunteers. Participating jurisdictions will meet once each five years with their local library staff members to discuss the mitigation plan so they are well-versed in its purpose and understand where to direct interested parties for more information, to provide feedback, or to become involved.*



Section 3 – Core Planning Group Member Action Item

Please submit comments to ACOEP regarding what your community is in favor of, and/or what your community opposes, regarding plan integration. **Comments should be submitted to Ed Conover no later than February 7, 2009. Feedback is not required; lack of response will be interpreted to indicate that your jurisdiction has no particular preferences regarding this plan element.**

