

## 7. Plan Maintenance

### 7.1. Update Process Summary

Monitoring, evaluating, and updating this plan are critical to maintaining its value and success in the Commonwealth's hazard mitigation efforts. Ensuring effective implementation of mitigation activities paves the way for continued momentum in the planning process and gives direction for the future. This section explains who will be responsible for maintenance and updating activities and what those responsibilities entail. It also provides a methodology and schedule of maintenance activities including a description of how the public will be involved on a continued basis.

In the years between the 2004 and 2007 plans, plan maintenance was led by PEMA. In this time frame, several modifications were undertaken in order to meet Enhanced Plan Status. The plan was updated to more fully integrate with other plans, especially the State Emergency Operations Plan and local hazard mitigation plans. PEMA incorporated local planning efforts and research documents into the risk and capability assessments of the existing plan. In the years between plans, PEMA also began exploring an information management system for tracking actions and projects based on NEMIS and the National Tool. PEMA did not maintain the plan in isolation, though; all Commonwealth agencies and departments were asked to review their mitigation actions and examine whether their organization had funding sources that could aid in completing mitigation actions. For a more complete discussion of the 2004-2007 triennial update, please see Section 3.1.

The plan maintenance procedure for 2007-2010 focused on having PEMA prepare any plan updates and submit them to the State Flood Budget Task Force, an entity incorporating the Office of Administration, Office of the Governor, PEMA, DEP, DCNR, and the Office of Administration, for review and evaluation. This Task Force was charged with reviewing goals and objectives to determine their applicability to the changing situations and policies of the Commonwealth. They were also responsible for reviewing the risk assessment and capabilities to determine if the information needed to be changed, updated, or removed. Reporting was to be compiled and added to the Elements of Change document accompanying the 2007 Plan. Due to technical, administrative, and financial constraints, this plan maintenance process could not be completed.

The plan maintenance procedure for 2010-2013 was led by PEMA's Bureau of Recovery and Mitigation and assisted by the USACE Silver Jackets and (for more information, see Section 3.2). The USACE Silver Jackets was established to support implementation of the flood related mitigation actions of the SSAHMP. Separate meetings to review the SSAHMP annually were planned but did not occur due to the volume of disaster response related work handled by BORM between 2010 and 2013. A great deal of progress was made towards implementation the mitigation strategy, though separate plan review meetings did not take place. The PA Tool, an online plan builder and project information management system aided in the plan maintenance process coordination between the local and state hazard mitigation plans.

The Silver Jackets was an effective method for maintenance on the SSAHMP and will be used moving forward to maintain and implement the 2013 SSAHMP update. Membership in the PA Silver jackets includes:

### *Federal*

- USACE
- FEMA, Region III
- NOAA and NWS
- USGS
- HUD
- NRCS
- EDA

### *Commonwealth*

- PennDOT
- PA Insurance Department
- PA Department of Agriculture
- PEMA
- DCED
- DEP
- DCNR

### *Regional*

- Susquehanna River Basin Commission (SRBC)
- Delaware River Basin Commission (DRBC)
- Interstate Commission on the Potomac River Basin (ICPRB)

### *Professional*

- PA Association of Floodplain Managers (PAFPM)
- Keystone Emergency Management Agency (KEMA)
- American Rivers Organization (ARO)

The following PA Silver Jackets meetings were held between the 2010 and 2013 update:

- May 7-9, 2013, Nonstructural Flood Proofing Workshops
- March 21, 2013, Webinar
- February 21, 2013, Webinar
- January 17, 2013, Quarterly Meeting
- December 20, 2012, Webinar
- November 15, 2012, Webinar
- October 18, 2012, Quarterly Meeting
- September 20, 2012, Webinar
- July 26, 2012, Quarterly Meeting
- June 21, 2012, Webinar
- May 17, 2012, Webinar
- April 19, 2012, Quarterly Meeting
- February 16, 2012, Webinar
- January 19, 2012, Quarterly Meeting
- December 15, 2011, Webinar

- November 17, 2011, Webinar
- October 20, 2011, Quarterly Meeting
- September 24, 2011, PEMA Workshop
- August 25, 2011, Webinar
- July 14, 2011, Quarterly Meeting
- June 16, 2011, Webinar
- May 12, 2011, Quarterly Meeting
- March 17, 2011, Webinar
- February 17, 2011, Webinar
- January 13, 2011, Quarterly Meeting
- December 16, 2010, Webinar
- November 18, 2010, Webinar
- October 19, 2010, Quarterly Meeting
- September 23, 2010, PA SJ Webinar
- August 18, 2010, First PA SJ Working Meeting - Harrisburg, PA
- March - June 2010, Participation in HMP Update (meetings, reviews)
- March 22, 2010, Silver Jackets Introduction to PA Reps Mtg - Harrisburg, PA

Moving forward, annual SSAHMP review meetings will be planned for 2014 and 2015. The SPT and Silver Jackets will be invited to these meetings. In 2016, there will be another set of in depth meetings focused on the SSAHMP update. The Silver Jackets will be used moving forward to maintain and implement the 2013 SSAHMP mitigation strategy for flood, dam and levee actions.

### **7.2. *Monitoring, Evaluating and Updating the Plan***

The Commonwealth recognizes that the Hazard Mitigation Plan is not a static document and requires regular review and evaluation. The plan will be monitored for changes in the conditions under which the plan was developed, such as new or revised state laws, major disaster declarations, or availability of funding. PEMA-BORM will take the lead in monitoring, evaluating, and conducting future updates. BORM will be assisted in this effort by the USACE Silver Jackets program, facilitated by PEMA's Area Offices, SHMO, Hazard Mitigation Planner, DEP Emergency Preparedness Liaison Officer, the DCED NFIP Coordinator, and/or the Bureau of Recovery and Mitigation to ensure the support of and representation from federal, state, and regional organizations and agencies. Additional members of the 2013 SPT and other interested parties will be encouraged to join and build the Silver Jackets.

The Commonwealth Hazard Mitigation Plan will be reviewed annually. In instances where there is a disaster declaration, a meeting of the Silver Jackets will be held soon after the disaster event to gather lessons learned. A meeting will also be held after a disaster event in order to bring in all Commonwealth agencies, describe what the disaster declaration means, and determine if any agencies have projects that could be funded through the declaration. In non-disaster settings, BORM supported by the Silver Jackets group will review the plan for changes in policy and will ensure that the plan addresses the current and expected conditions. Members will also review the risk assessment and capabilities portion of the plan to determine if this information needs to be updated or modified. Mitigation strategies and their associated actions will be reported upon by the party, agency, or department responsible for their implementation,

and will include which implementation processes worked well, difficulties encountered, how coordination efforts were proceeding, and which strategies or processes need to be revised or strengthened.

Goals, objectives, and actions will be reviewed annually and in the event of a disaster to determine whether they need to be modified to reflect new conditions. Findings will be appended to the existing plan. Goals, objectives, and actions will also be reviewed annually by the Governor and the State Legislature. Objectives pertinent to HMGP are also reviewed after each disaster and are formalized with the preparation of the Administrative Plan; this provides a roadmap to consistency between funding programs. A new Administrative Plan will be added after each disaster, if applicable.

PEMA, with assistance by the Silver Jackets, will then create a list of recommendations that suggests ways to update the plan. PEMA will be responsible for making the necessary changes to the plan. The revised plan will be submitted for approval to FEMA and, upon approval, will be incorporated into the State Emergency Operations Plan. FEMA will be notified that the plan was changed. The plan will be updated after each disaster event to include a post-disaster mitigation strategy that outlines Commonwealth priorities for future disaster events. This plan maintenance process will be modified as appropriate should a significant fiscal or personnel constraint arise. The Triennial Updating of the State All- Hazards Mitigation Plan will be completed, FEMA Approved and State Adopted by the 2013 Anniversary date.

A key component of the bi-annual review of the Commonwealth Hazard Mitigation Plan will be ensuring continued compliance of 44 CFR 13.11. At each review, the Commonwealth will ensure that it still complies with federal statutes and regulations that pertain to grant funding. This will additionally ensure proper distribution of grant funding. In addition, the Commonwealth of Pennsylvania will amend its plan whenever necessary to reflect changes in State or Federal laws and statues as required in 44 CFR 13.11(d).

Minutes from quarterly and other meetings related to the plan will be filed and saved so that they may be included in the Planning Process Appendix for the 2013 SSAHMP update. Other information pertinent to the Commonwealth's progress with hazard mitigation, such as news articles should also be saved in this file for incorporation in the updated SSAHMP appendix.

The Pennsylvania's Silver Jackets Team was recognized in September of 2013 for being the Silver jackets team of the Year. This award recognizes everything that the team accomplished since being established during the 2010 SSAHMP update and illustrates that their role in implementing the 2013 SSAHMP continues to be an excellent choice.

### **7.3. *Continued Public Involvement***

PEMA will involve the public during periodic evaluations of the SSAHMP by providing an opportunity to submit comments about the plan. The public will have access to the plan online and through the Bureau of Recovery and Mitigation. The public is encouraged to submit comment on the plan at any time. Relevant comments will be incorporated into the plan's next update.

PEMA's Bureau of Recovery and Mitigation will also distribute ReadyPA preparedness and mitigation information at meetings. Information on upcoming events relating to hazard mitigation planning will be announced in newsletters, newspapers, mailings, and on the PEMA website ([www.pema.state.pa.us](http://www.pema.state.pa.us)). The Bureau of Recovery and Mitigation will also engage the public by encouraging the use of the PA Alert system, which provides citizens and partners with timely information on emergency and weather alerts, health notifications, tax notifications, and updates. When applicable, contact information for PEMA will be included in alert notices to encourage 2-way communication. Additionally, the Bureau of Recovery and Mitigation supports individual counties with information and materials as well as personnel to support local hazard mitigation efforts.

### **7.4. Monitoring Progress of Mitigation Actions**

#### **7.4.1. Project Reporting**

PEMA's Bureau of Recovery and Mitigation is responsible for the monitoring and tracking of the progress of mitigation measures taken on a Commonwealth-wide basis by the individual actions of Commonwealth agencies and departments as well as the counties and their jurisdictions. PEMA will provide FEMA with the status of properties acquired, relocated, elevated, or retrofitted. The Bureau, through the Emergency Preparedness Liaison Officers, will also assign personnel to follow up with other agencies' staff on a quarterly basis as to the progress of state-obligated mitigation measures. PEMA staff will submit quarterly project reports to FEMA to address all active projects in all grant areas. They also track project awards and progress in the grants management database.

Projects will be divided for evaluation by the subject matter of each project and assigned to appropriate staff members. PEMA staff shall develop an evaluation document that addresses outcomes or the success of projects. The team will assess new information provided through research and disaster assessment reports to update the baseline data. The team will review the level of coordination among state agencies. This review is key to the success in implementing the plan.

The project reporting process will be more uniform and efficient with the advent of the PA Tool. With all projects in a digital inventory, it becomes easier to categorize potential projects. Once a project has a Letter of Intent or Interest, it becomes part of the PEMA Hazard Mitigation Fiscal and Project database. The PA Tool was an improvement over the 2007 project reporting because both fiscal and project officers have visibility on all projects worked. Increasing use of these database tools will assist in more efficient implementation, tracking, and management as the Commonwealth moves towards its goal of receiving Enhanced Plan Status. In the period between 2010 and 2013, HMGP funding was available for winter storm disaster (DR-1898), severe storms and flooding (DR-4003), Hurricane Irene (4025-DR), Tropical Storm Lee (4030-DR), and Hurricane Sandy (DR-4099). This led to funding for projects and related project reporting documented in Section 6.3.1.2 Support of Local Hazard Mitigation Projects. Many grant applications were eligible but did not receive funding; this provides PEMA with a list of 'shovel ready' projects to facilitate applications for future funding.

#### **7.4.2. Project Closeout Process**

“Project closeout” is the process that finalizes a completed mitigation project that FEMA has funded. Closeout will be conducted based on FEMA Region III closeout procedures. Projects and activities funded through other federal or state grant programs, state general funds or that can be achieved without targeted funding will be completed as dictated by the funding source or state program with administrative oversight for the activity of the project.

The PEMA administrative closeout process for HMGP is a 12-step process that is carried out by PEMA, the applicant, and FEMA. As established in the PEMA process, final site visit inspections are required with both the applicant and PEMA present at the conclusion of the project. Additionally, all acquisition projects have a mandatory three-year mitigation compliance inspection to ensure the property is still being maintained as open space. According to HMA Guidance, municipalities are responsible for this triennial maintenance; they must report to compliance to the Commonwealth, who in turn reports to FEMA. There are twelve main steps to completing the close-out process:

1. Site Stabilization
2. Sub-grantee Closeout Request Letter (R-25)
3. Site Visits/Photos/Latitude-Longitude by PEMA/FEMA
4. Codes Compliance Letter (R-26)
5. NFIP RL Update Worksheet AW-501 (R-27 & R-28)
6. PEMA will conduct a desk audit of project file
7. PEMA Financial Reconciliation/Revised Budget
8. PEMA Close-out Request Letter to FEMA Region III
9. HMGP Quarterly Webinars/Reports continue
10. FEMA Close-out Letter received
11. Open Space Requirements/Subsequent transfer
12. Monitoring, Reporting, and Inspection

Additional details on the Project Closeout and full grants management process are outlined in PEMA’s HMPO Handbook.