



5 COORDINATION OF LOCAL MITIGATION PLANS

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This chapter focuses on three aspects of the state’s involvement in local mitigation planning:

- Local Funding and Technical Assistance
- Local Plan Integration
- Prioritizing Local Assistance

5.1. Local Funding and Technical Assistance

Requirement 201.4(c)(4)(i): [The section on the Coordination of Local Mitigation Planning must include a] description of the State process to support, through funding and technical assistance, the development of local mitigation plans

5.1.1 Background

The State of Kansas is committed to supporting a successful mitigation planning and programming effort at the local level. To date, this commitment has included financial and technical assistance for planning as well as project implementation.

For purposes of tracking the statewide mitigation planning effort, the counties are considered to be the primary local jurisdictions. There are 105 counties in Kansas. Based on information from the Kansas Division of Emergency Management Planning Section, **Table 5.1** shows the status of the plans that are approved or approved, pending adoption. A significant increase in the number of approved plans has occurred since the last Kansas Hazard Mitigation Plan update. Currently there are 104 of 105 counties with approved multi-jurisdictional hazard mitigation plans.

Table 5.1. Status of Hazard Mitigation Plans

Type of Plan	Approved Plans	In Progress Plans
Multi-jurisdictional Plan (County)	104	1
Tribal Plan (Local)	1	0
State Plan (Standard)	1	0

5.1.2 Process to Provide Local Assistance

In early 2003, the Kansas Hazard Mitigation Team (KHMT) established a statewide program for local mitigation planning. The Kansas Division of Emergency Management (KDEM) is the coordinating body for local hazard mitigation planning. Its responsibilities include:

- Providing funding, as available, to develop local hazard mitigation plans;
- Developing a schedule for completion of local hazard mitigation plans;
- Establishing local hazard mitigation planning criteria;
- Establishing standard methodologies for the identification of hazards, definition of vulnerabilities, and estimation of risk;
- Suggesting categories of critical facilities and systems that are to be addressed in local hazard mitigation plans;

- Providing planning guidance and/or training for local jurisdictions;
- Providing technical support for local hazard mitigation planning efforts;
- Establishing a procedure for receipt and review of completed local plans (including working with FEMA); and
- Implementing a process to monitor implementation of local hazard mitigation plans.

In light of the number of disasters and the significant amount of Hazard Mitigation Grant Program (HMGP) funding received since 2008, the state placed an emphasis on the completion and adoption of FEMA approved plans for all Kansas counties. Kansas was extremely successful in this endeavor and currently there are 104 of 105 counties in Kansas covered by an approved Hazard Mitigation Plan. The remaining county is in the process of completing a plan and expects to receive approval in 2013.

KDEM is committed to maintaining local eligibility for funding and in order to maintain the current hazard mitigation plans, KDEM has undertaken a new initiative to assure that the plans are updated within the timeframes. This initiative supports regional planning throughout the State. Generally following Homeland Security Regional boundaries, the State has been divided into 12 regions. KDEM has hired 2 contractors to assist KDEM mitigation planning staff with preparation of the regional plans. An informational presentation regarding the regional process was provided at the 2011 Kansas Emergency Management Association annual meeting. This meeting is attended by a large number of local emergency managers. Counties were given the opportunity following the meeting to enroll in the process for becoming part of the regional plan. At the time of this 2013 update, KDEM has begun the process of Kickoff meetings for 4 of the regions. The plans are being updated at no cost to the counties. By the time of the next update, all of the regional plans will have been completed. Counties that wish to complete updates to their individual plans are encouraged to do so at their own cost.

Using protocols provided by FEMA, such as the *Multi-Hazard Mitigation Planning Guidance under DMA 2000*, the “how-to” guides, and the October 2011 *Local Mitigation Plan Review Guide* and Review Tool, KDEM assists Kansas jurisdictions to better understand the planning process and their hazard landscapes to allow the most beneficial projects to be selected. This ongoing support function consists of workshops as well as one-on-one meetings with individuals and committees. In addition to the planning guidance, training, and support offered by KDEM, there are several state agencies and programs that can provide local governments with technical assistance in their hazard mitigation planning. Some of this assistance is described below. More information can be found in Section 4.2 State Capability Assessment.

- The Data Access and Support Center provides GIS data.
- The Kansas Department of Agriculture provides information and advice about food supply safety, flood control (floodplain management, dams and levees), and water availability.
- The Kansas Department of Commerce administers community development programs, which can help local governments incorporate mitigation into community development programs.
- The Kansas Department of Health and Environment helps local governments plan for response to major disease outbreaks and to protect the environment.

- The Kansas Forest Service helps with wildfire planning and is working to map the wildland-urban interface.
- The Kansas Geological Survey provides information about geological hazards in Kansas as well as surface and groundwater issues.
- The Kansas Water Office has developed guidelines for preparation of municipal water conservation plans. Technical assistance for plan preparation is provided by the Kansas Rural Water Association. The Kansas Water Office also has prepared a guide for local officials covering drought actions they should consider and available assistance.
- The State Conservation Commission works with local conservation districts to plan for watershed development and protection (including flood control and rehabilitation projects).

5.2. Local Plan Integration

Requirement 201.4(c)(4)(ii): [The section on the coordination of local mitigation planning must include a] description of the state process and timeframe by which the local plans will be reviewed, coordinated, and linked to the state mitigation plan.

Update 201.4(d): [The] plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities.

5.2.1 Review and Approval of Local Plans

KDEM reviews submitted local hazard mitigation plans within 45 days of receipt and, if necessary, offers guidance and recommendations to the local planning groups on how to improve the plans and/or make them better comply with federal requirements. As part of the State review, the FEMA Review Tool is completed. Upon completion of the state-level review and incorporation of revisions by the responsible jurisdictions, local hazard mitigation plans are forwarded to FEMA for federal review. FEMA conducts a similar review and works through KDEM to get necessary revisions made and issue approvals. Once FEMA is satisfied that plans meet federal requirements, they approve the plans “pending adoption.” Once approved and pending adoption, it is then up to the local jurisdictions to formally adopt the plans and send copies of the adoption letters to FEMA through KDEM. FEMA officially approves the plans once the adoption letters are received. Only then are the local jurisdictions eligible for the benefits available to those with approved local hazard mitigation plans. The same process is being utilized for regional plans being completed by contract staff. FEMA Region VII assisted in the training of the contract staff in 2013.

There are 104 FEMA approved county-level hazard mitigation plans currently. By the next plan update, KDEM anticipates that the majority of the 105 counties will have opted to participate in the regional mitigation planning process. The 12 regional plans will be FEMA approved by the 2016 update.

5.2.2 Linking Regional and Local Plans with the State Plan

In Kansas, there is a strong interest in integrating the State's hazard mitigation plan and programs with the mitigation planning and programming efforts at the local and regional level. While local jurisdictions and the contract planners completing the Regional Mitigation Plans are using the state plan as a resource for their own plans, the KHMT recognizes the importance of using data developed through local planning processes in the state plan, since it is more relevant to community needs, desires, and capabilities. For all future state plan updates (the next update is scheduled for 2016), the State will review available regional and any remaining local plans and consider the following for incorporation into the state plan:

- Identification of hazards and risk estimation, specifically those hazards that are unique and varied
- Compilation of property value and populations at risk for different hazards
- Identification of locally important critical facilities and their vulnerability
- Identification of rapidly developing communities
- Identification of any regionally conducted capability assessments
- Identification of regional planning resources
- Evaluation of any regionally created mitigation goals, programs, policies, and actions
- Compilation of the local costs of disasters and the demonstrated value of preexisting mitigation initiatives
- Identification of regional and local proposals for mitigation initiatives
- Implementation status of regional and local mitigation initiatives

This information will be used to:

- Update the statewide mitigation strategy
- Support the statewide risk assessment process
- Update the comprehensive, statewide inventory of state and local critical facilities
- Identify jurisdictions with development pressures and assess the strength of the corresponding hazard mitigation plans, policies, and programs
- Provide a basis for ongoing documentation and assessment of local mitigation strategies and actions
- Facilitate the efforts of KDEM to prioritize and select local mitigation actions for funding

Currently, the plans are being integrated into the state plan during the update processes.

5.2.3 Challenges in Plan Integration

At the time of this update, 104 of 105 Kansas counties have FEMA approved hazard mitigation plans. There are a few plans at various stages of the update process. The KHMT analyzed goals, capabilities and mitigation action data from the 104 approved plans. As the regional plans and any remaining local plans are completed, the State will enter the plan information into a newly developed database, which will include local hazard information, which goals and action items correlate with the State's goals and prioritized mitigation items. The newly developed

database that integrates the local plan data and correlates it to the state plan information will allow KDEM to easily reflect changes in development and priorities with regional and local plan information if necessary.

Another significant challenge to plan integration is the inconsistency of methodologies used to develop plans, specifically in regard to hazard identification and vulnerability assessment. Although the State tried to avoid this problem by providing software to local jurisdictions, the software has not been consistently used and applied across jurisdictions. Coordination of the regional planning process through the KDEM employed contract staff allows a consistent methodology to be utilized for risk assessments. The methodology being employed is the same as the methodology utilized for the State Hazard Mitigation Plan. Once the regional plans are completed, the database will allow KDEM to conduct a comprehensive analysis of those areas with unique and varied risk.



Source: FEMA News Photo

5.3. Prioritizing Local Assistance

Requirement 201.4(c)(3)(iii): [The section on the Coordination of Local Mitigation Planning must include] criteria for prioritizing communities and local jurisdictions that would receive planning and project grants under available funding programs which should include:

- Consideration for communities with the highest risks,
- Repetitive loss properties, and
- Most intense development pressures.

Further that for non-planning grants, a principal criterion for prioritizing grants shall be the extent to which benefits are maximized according to a cost benefit review of proposed projects and their associated costs.

Update Requirement §201.4(d): [The] plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts and changes in priorities.

5.3.1 Criteria for Planning Grants

The HMGP requires regional and local jurisdictions to have approved plans in order to receive project funding. KDEM evaluates plans for opportunities for planning and other projects. As an example, in 2011, KDEM offered funding for tornado sirens for jurisdictions through the HMGP program. The current regional planning process is being offered to counties at no cost.

5.3.2 Criteria for Project Grants

KDEM, with guidance from the KHMT, is responsible for administration of state and federal grants that support local mitigation programming. The criteria for project grants presented in the original plan have been largely replaced by the “Project Priorities and Selection” process set forth in the State of Kansas Hazard Mitigation Grant Program Administrative Plan. Because the amount of funding has decreased substantially since the last update and the number of eligible applicants for funding has increased, it has become necessary for KDEM to make revisions to its process for soliciting and evaluating projects. Once funding is available, KDEM undertakes a Notice of Intent process and notifies local emergency managers that funding is available and that projects are being solicited. Limited information regarding the proposed projects is collected and evaluated using criteria described below.

If it is necessary to select from a range of projects due to funding or other constraints, the governor’s authorized representative/state hazard mitigation officer will, with the assistance of the KHMT, and other state agency staff members as required, evaluate and prioritize all eligible applications. This ranking will be in accordance with the established KDEM criteria for funding of projects (see below). Projects must be in compliance with the minimum project criteria identified in 44 CFR 206.434:

- Be in conformance with the State Hazard Mitigation Plan and Local Hazard Mitigation Plan approved under 44 CFR part 201;
- Have a beneficial impact upon the designated disaster area, whether or not located in the designated area;
- Be in conformance with 44 CFR part 9, Floodplain Management and Protection of Wetlands, and 44 CFR part 10, Environmental Considerations;
- Solve a problem independently or constitute a functional portion of a solution where there is assurance that the project as a whole will be completed. Projects that merely identify or analyze hazards or problems are not eligible; and
- Be cost-effective and substantially reduce the risk of future damage, hardship, loss, or suffering resulting from a major disaster. The grantee must demonstrate this by documenting that the project:
 - Addresses a problem that has been repetitive, or a problem that poses a significant risk to public health and safety if left unsolved;
 - Will not cost more than the anticipated value of the reduction in both direct damages and subsequent negative impacts to the area if future disasters were to occur (both costs and benefits will be computed on a net present value basis);
 - Has been determined to be the most practical, effective, and environmentally sound alternative after consideration of a range of options;
 - Contributes, to the extent practicable, to a long-term solution to the problem it is intended to address; and
 - Considers long-term changes to the areas and entities it protects, and has manageable future maintenance and modification requirements.

KDEM uses the following criteria to determine project eligibility and to assist in prioritizing projects. Evaluation factors for mitigation projects under HMGP and the respective weighting of each are:

- 1) Was the community in the declared disaster area? (25 percent – this is an all or nothing score);
- 2) Is the project the community is applying for in direct relation to the hazard that precipitated the declared disaster?(25 percent – this is an all or nothing score);
- 3) Was the community applying directly affected by the disaster, for which they are applying?(25% this is an all or nothing score);
- 4) Viability of the proposed mitigation project. Is it an appropriate strategy? Is it consistent with community plans/goals? Is it potentially cost-effective? Does it solve a problem independently or constitute a functional portion of a solution? (25 percent);
- 5) Sufficient staff and resources for implementation of the proposed mitigation project (15 percent);
- 6) Durability of the financial and social benefits that will be achieved through the proposed mitigation project. Will the mitigation option, to the extent practicable, contribute to a long term solution to the problem it is intended to address? (15 percent);
- 7) Does the proposed mitigation project address a hazard where there have been repetitive impacts or occurrences in the project area? (10 percent);
- 8) Protection of critical facilities as defined below (5 percent)*;

- 9) Inclusion of outreach activities appropriate to the proposed mitigation project (e.g., signs, press releases, success stories, losses avoided analysis) that advance mitigation and/or serves as a model for other communities (5 percent)

*Per FEMA PDM Guidance, critical facilities are defined as Hazardous Materials Facilities, Emergency Operation Centers, Power Facilities, Water Facilities, Sewer and Wastewater Treatment Facilities, Communications Facilities, Emergency Medical Care Facilities, Fire Protection, and Emergency Facilities.

In the event that all the grant money made available to the State, due to the declared disaster, is not dispersed to the affected counties, the application period will be open statewide to all applicants with eligible projects. The same priorities will be followed.

Following is the List of Priorities for the current Disaster Period. Following the approval of this update, the hazard list will be updated to include Civil Disorder and remove Fog.

1. Flood	2. Tornado	3. Windstorm
4. Winter Storm	5. Major Disease	6. Wildfire
7. Hailstorm	8. Agricultural Infestation	9. Hazardous Materials
10. Utility/Infrastructure Line	11. Terrorism/Agri-Terrorism	12. Land Subsidence
13. Expansive Soils	14. Lighting	15. Extreme Temperatures
16. Drought	17. Dam and Levee Failure	18. Landslide
19. Radiological	20. Soil Erosion and Dust	21. Earthquake
22. Fog		

5.3.3 Successes and Challenges of Prioritization

To simplify administration of the State’s mitigation program, the KHMT streamlined the plan’s prioritization process so that it is more consistent with the existing process established by the State of Kansas Hazard Mitigation Grant Program Administrative Plan. The State now has one set of criteria for project prioritization that can be expanded upon as necessary based on the requirements of the particular grant program being pursued. Once the regional plans are completed and data obtained by those planning efforts entered into the new database the process for integrating the regional and local plans with the state plan to prioritize mitigation efforts will be substantially simplified.