

SECTION 7: PLAN MAINTENANCE PROCEDURES

This section describes the system that Lehigh and Northampton counties and all participating jurisdictions have established to monitor, evaluate, and update the mitigation plan; implement the mitigation plan through existing programs; and solicit continued public involvement for plan maintenance.

7.1 Monitoring, Evaluating and Updating the Plan

This section presents the procedures for monitoring, evaluating, and updating the plan.

The Lehigh Valley Hazard Mitigation Steering Committee (“Steering Committee”) intends to remain intact as the organization responsible for monitoring, evaluating and updating this plan. Ms. Angel Gillette, the Northampton County Emergency Management Services (NCEMS) Hazard Mitigation and Disaster Recovery Manager, shall continue to act as the coordinator for the Steering Committee. Each participating jurisdiction is expected to maintain a municipal hazard mitigation representative to support their jurisdiction’s input to the monitoring, evaluation and updating responsibilities identified in this section. Table 7-1 identifies the representation on the Steering Committee as of the date of this plan update. Ongoing municipal hazard mitigation planning points of contact are identified in each jurisdiction’s annex (Section 9).

Table 7-1. Lehigh Valley Hazard Mitigation Plan Update Steering Committee Membership

Name	Title	Department / Agency
Angel Gillette, CEM	Manager, Hazard Mitigation and Disaster Recovery	Northampton County Emergency Management Services
Robert Mateff, ENP	Director/Coordinator	Northampton County Emergency Management Services
William Hillanbrand, MA	Emergency Management Planning Manager	Northampton County Emergency Management Services
Nick Tylenda	Deputy Director	Northampton County Emergency Management Services
Todd Weaver, ENP	Deputy Director for Systems Management	Northampton County Emergency Management Services
Tanya Hook	County Mitigation Lead – Community Outreach Coordinator	Lehigh County Emergency Management Agency
Thomas Nervine	Director	Lehigh County Emergency Management Agency
Nicole Burton	Administrative Assistant	Lehigh County Emergency Management Agency
David Fenton	Operations and Training Coordinator	Lehigh County Emergency Management Agency
Geoffrey Reese, PE	Assistant Director	Lehigh Valley Planning Commission
Susan Rockwell	Senior Environmental Planner	Lehigh Valley Planning Commission

It is recognized that individual commitments change over time, and it shall be the responsibility of each jurisdiction and its representatives to inform the NCEMS Hazard Mitigation and Disaster Recovery Manager of any changes in representation by formal letter. The NCEMS Hazard Mitigation and Disaster Recovery Manager shall maintain the current membership of the Steering Committee and municipal representatives on the Lehigh Valley Hazard Mitigation Plan public website at http://www.nc911.org/html/hazard_mitigation.html.

7.1.1 Monitoring and Evaluating

The NCEMS Hazard Mitigation and Disaster Recovery Manager shall be responsible for monitoring progress on, and evaluating the effectiveness of the plan update, and documenting this with the Pennsylvania Emergency Management Agency (PEMA) and the Federal Emergency Management Agency (FEMA) Region III. The evaluation of the plan update is an assessment of whether the planning process and actions have been effective, if the plan goals are being reached, and whether changes are needed. These evaluations will assess whether:

- Mitigation goals address current and expected conditions;
- The nature or magnitude of the risks has changed;
- Current resources are appropriate for implementing the plan and if different or additional resources are now available;
- Actions were cost effective;
- Schedules and budgets are feasible;
- Implementation problems, such as technical, political, legal or coordination issues with other agencies exist;
- Outcomes have occurred as expected;
- Changes in municipal resources impacted plan implementation (for example, funding, personnel, and equipment);
- New agencies/departments/staff should be included, including other local governments as defined under 44 CFR 201.6;
- Documentation of hazard events that occurred during the previous year.

Finally, the Steering Committee will evaluate how other programs and policies have conflicted or augmented planned or implemented measures, and shall identify policies, programs, practices, and procedures that could be modified to accommodate hazard mitigation actions (see the “Implementation of Mitigation Plan through Existing Programs” subsection later in this section).

7.1.2 Annual Plan Review

Monitoring of plan progress and evaluating effectiveness shall be accomplished through an annual plan review process, initiated by the NCEMS Hazard Mitigation and Disaster Recovery Manager and working directly with each participating jurisdiction.

The annual plan review process shall begin in May of each year, timed to coincide with the annual FEMA Hazard Mitigation Assistance (HMA) program announcement. At this time, the NCEMS Hazard Mitigation and Disaster Recovery Manager shall call a meeting of the Steering Committee to discuss how to conduct the annual review and reporting process for the year. At this meeting, the Steering Committee shall determine the method by which county departments and agencies and municipalities will be

surveyed for information to go into the annual review and report, and set a schedule and assign responsibilities to complete the review and reporting process.

While the actual methods and tools for this review and reporting will be established by the Steering Committee each year, it is anticipated that the process will include the following:

- Preparing and distributing a county department/agency progress survey (one for each county) to identify progress on county-level mitigation actions, and identify new actions and initiatives to be added to the county strategies;
- Preparing an annual municipal mitigation progress reporting form for distribution to all municipalities ahead of an annual meeting of the planning partnership;
- Inviting the planning partnership to the annual meeting, and providing the municipal mitigation progress reporting form;
- Conducting an annual meeting of the municipal planning partnership, at which the following will be discussed:
 - Mitigation progress and activity at the county and regional level;
 - How to complete the municipal mitigation progress reporting form, and schedule for completion;
 - Adding and/or eliminating mitigation projects/activities/initiatives from the local mitigation action plans;
 - Mitigation successes, problems, concerns and issues regarding plan implementation at the local level;
 - Mitigation resources available, including upcoming and potential training programs;
 - Annual HMA grant program (process to apply, schedule, etc.);
- Preparing and submitting an annual progress report to PEMA and FEMA Region III.

For county-level activity, the Lehigh County Emergency Management Agency (LCEMA) and NCEMS shall task their county department and agency representatives to collect and process information on mitigation activity and progress from their respective departments and agencies. At the municipal level, the Steering Committee shall collect and compile municipal survey forms, information provided at the annual plan review meeting with the communities, and conduct phone calls and meetings with persons responsible for initiating and/or overseeing the mitigation projects to obtain progress information. Copies of any grant applications filed on behalf of any of the participating jurisdictions shall be provided to the Steering Committee. Further, the representatives shall obtain from their municipal supervisor/administrator or clerk any public comments made on the plan update and provide to the Steering Committee for inclusion in the annual report.

Through this process, the Steering Committee and municipal representatives shall be expected to document, as needed and appropriate:

- Hazard events and losses occurring in their jurisdiction including their nature and extent and the effects that hazard mitigation actions have had on impacts and losses;
- Progress on the implementation of mitigation actions, including efforts to obtain outside funding for mitigation actions;
- Any obstacles or impediments to the implementation of actions;
- Additional mitigation actions believed to be appropriate and feasible;
- Public and stakeholder input and comment on the plan update.

The NCEMS Hazard Mitigation and Disaster Recovery Manager shall be responsible for preparing an Annual HMP Progress Report, based on the local annual progress reports provided by each jurisdiction, information presented at the annual Steering Committee meeting, and other information as appropriate and relevant. While the main purposes of this report are to document progress on plan implementation at the county and local level, and to formally document updates to the county and local mitigation strategies, these annual reports will provide data for the five-year update of this plan and will assist in pinpointing implementation challenges. By monitoring the implementation of the plan on an annual basis, the Steering Committee will be able to assess which projects are completed, which are no longer feasible, and what projects may require additional funding.

The Annual HMP Progress Report shall be posted on the Lehigh Valley Hazard Mitigation Plan public website at http://www.nc911.org/html/hazard_mitigation.html to keep the public apprised of the plan's implementation. This report will also be provided to any community participating in the Community Rating System (CRS) program to meet CRS Activity 510 and annual CRS recertification requirements. To meet this recertification timeline, the Steering Committee will strive to complete the review process and prepare an Annual HMP Progress Report by the end of October.

Post-Disaster:

After a declared disaster or major hazard event in the Lehigh Valley, the NCEMS Hazard Mitigation and Disaster Recovery Manager and Steering Committee may elect to meet with the municipal planning partnership to:

- Discuss ongoing recovery and public assistance efforts;
- Discuss data and information collection on the disaster;
- Evaluate the effectiveness of mitigation projects completed in the county and municipalities;
- Identify specific areas of vulnerability evident in the wake of the disaster;
- Identify potential mitigation actions and opportunities to address new areas of vulnerability;
- Discuss current or anticipated grant opportunities (e.g. HMGP) in the wake of the disaster.

7.1.3 Plan Maintenance and Updating

44 CFR 201.6.d.3 requires that local hazard mitigation plans be reviewed, revised as appropriate, and resubmitted for approval in order to remain eligible for benefits awarded under DMA 2000. It is the intent of the Steering Committee to update this plan on a five year cycle from the date of adoption (to be formally established by FEMA). Ongoing maintenance and updating of the plan shall be the responsibility of the NCEMS Hazard Mitigation and Disaster Recovery Manager, working with the Steering Committee and municipal planning partners.

To facilitate the update process, the NCEMS Hazard Mitigation and Disaster Recovery Manager, with support of the Steering Committee, shall use the **third** annual plan review process to develop and commence the implementation of a detailed plan update program. The NCEMS Hazard Mitigation and Disaster Recovery Manager shall invite representatives from PEMA and FEMA Region III to this meeting to provide guidance on plan update procedures. This program shall, at a minimum, establish who shall be responsible for managing and completing the plan update effort, what needs to be included in the updated plan, and a detailed timeline with milestones to assure that the update is completed according to regulatory requirements. At this meeting, the Steering Committee shall determine what resources will be needed to complete the update. The NCEMS Hazard Mitigation and Disaster Recovery Manager shall be responsible for assuring that needed resources are secured.

Following each five year update, the updated plan will be distributed for public comment. After all comments are addressed, the plan will be revised and distributed to all municipal planning partners, the Pennsylvania State Hazard Mitigation Officer, and FEMA Region III.

7.2 Implementation of Mitigation Plan through Existing Programs

The two counties and participating jurisdictions have provided a listing of related programs, through which mitigation planning may be implemented, in the local capability assessments provided in each jurisdictional annex (Volume II, Section 9). In addition, a full discussion on relevant federal, state, regional, county and local plans and programs is provided in Section 5, “Capability Assessment.”

It is the intention of the Steering Committee and participating jurisdictions to incorporate mitigation planning as an integral component of daily government operations. Steering Committee members will work with local government officials to integrate hazard mitigation goals and actions into the general operations of government and partner organizations. Further, the sample adoption resolution (Appendix F) includes a resolution item stating the intent of the local governing body to incorporate mitigation planning as an integral component of government and partner operations. By doing so, the Steering Committee anticipates that:

- 1) Hazard mitigation planning will be formally recognized as an integral part of overall emergency management efforts;
- 2) This plan update and other planning documents and programs will become mutually supportive efforts that work in concert to meet the goals and needs of the county and municipalities;
- 3) Duplication of effort can be minimized.

The information on hazard, risk, vulnerability and mitigation contained in this plan update is based on the best science, data and technology available at the time of the plan update’s preparation. It is recognized by all participating jurisdictions that this information can be invaluable in making decisions under other planning programs, such as comprehensive, long-term community recovery plans, watershed management plans, capital improvement, and emergency management plans.

Section 3.6 “Integration/Coordination with Existing Plans and Programs” identified how existing plans and programs have been integrated into this updated plan. The following identifies how this plan will continue to promote and effect that coordination during the implementation of this updated plan.

7.2.1 Emergency Management Plans and Programs:

The LCEMA and NCEMS and municipalities in the Lehigh Valley recognize that the findings and recommendations of this plan update need to be incorporated into their emergency planning, preparedness, response and recovery programs and operations.

The HAZUS-MH datasets and projects developed for this plan update shall be provided to the two counties for their use in ongoing and future emergency management planning, preparedness, response and recovery programs and activities. It is noted that the flood depth grids created for this update provide critical information about not only the locations of flood inundation, but the depth of inundation at a high level of resolution (10-foot grid cells). This process could be expanded to provide flood depth grid maps for varying levels of flooding (return periods), allowing emergency managers to better plan for

evacuations, road closures and detours, and emergency access. Further, the HAZUS models and results may support other emergency response and recovery programs such as sheltering, debris management and risk communication.

Public education and outreach to improve personal preparedness, and promote an awareness of mitigation opportunities and personal protection through risk insurance, have been incorporated in specific county and local initiatives.

7.2.2 Comprehensive Planning and Land Use Regulation:

The availability of model ordinances (e.g. floodplain management, sinkholes, steep slopes) developed by the Lehigh Valley Planning Commission (LVPC) to address the specific risks and regulatory frameworks of the Lehigh Valley, was presented to the planning partnership during the planning process, discussed at the Jurisdictional Annex Workshops, and included in mitigation strategy identification/development resources provided to the plan participants.

It was the intention that through this planning process, municipalities shall incorporate the findings and recommendations of this plan update into future local planning efforts, and into the overall execution of their land-use planning process (e.g. site plan review, permitting, code enforcement). Known or anticipated future development in the Lehigh Valley was identified at the county and local level, including the identification of known hazard risks and risk zones, within the jurisdictional annexes (Section 9).

7.2.3 Act 167 Stormwater Management Plans:

The LVPC provided Act 167 Stormwater Management Plans for the entire Lehigh Valley. Information that was incorporated into this plan update includes general watershed information, identification of floodprone areas and known restrictions, and potential mitigation projects. At the Jurisdictional Annex Workshops, all municipalities were provided excerpts (hard copy and on CD) of the salient portions of the Act 167 Stormwater Management Plans for their watershed for their review and use as they were developing their jurisdictional annexes.

In 2007, the LVPC secured a 5-year bi-county contract from the Pennsylvania Department of Environmental Protection (PADEP) to update existing Act 167 plans. The LVPC began work under the contract, however due to lack of funding PADEP terminated all Act 167 contracts in 2010. LVPC work on these plan updates is deferred until funding is restored.

7.2.4 National Flood Insurance Program (NFIP) and the Community Rating System (CRS):

FEMA Region III provided NFIP policy, claims and repetitive loss data for the entire Lehigh Valley. This data was incorporated in the flood hazard profiling and risk assessment (Section 4), as well as into the municipal annexes in Section 9. All municipalities were encouraged to include mitigation initiatives that specify continued and enhanced participation in the NFIP, and address their flood vulnerable structures and infrastructure, including Repetitive Loss (RL) and Severe Repetitive Loss (SRL) properties.

Both counties and all municipalities have identified public outreach initiatives that include increasing public awareness of and participation in the NFIP. Further, both counties have identified that they will be hosting a hazard insurance forum with major regional insurers to better understand hazard insurance issues (requirements, availability, limitations, costs, etc.) and thus be better able to inform the public.

As updated NFIP mapping is adopted in the Lehigh Valley, communities will need to adopt this mapping, update their NFIP Flood Damage Prevention Ordinances, and assist their residents with issues such as Letters of Map Amendment (LOMAs). FEMA Region III and the State NFIP Coordinator's office provide support for these efforts, in addition to the LVPC who prepared a model Floodplain Ordinance for use by Lehigh Valley communities.

Currently within the Lehigh Valley only Hanover Township in Northampton County participates in the CRS program, with a current rating of 9 (5% discount on flood insurance premiums). Northampton County Emergency Management Services sponsored a CRS workshop in May 2012 to inform the communities of the programs and encourage participation. Increased participation in the Lehigh Valley will continue to be supported by both Counties as identified in their updated mitigation strategies. Further, certain communities in the Lehigh Valley have identified in their updated mitigation strategies that they plan to apply to the CRS program.

7.2.5 FEMA Unified Hazard Mitigation Assistance (Unified HMA) Grant Programs:

As the counties and municipalities updated their mitigation strategies, potentially mitigation grant eligible projects have been indicated as such when identifying the potential funding source. LCEMA and NCEMS will continue to inform their inclusive municipalities as mitigation grant opportunities are announced by PEMA, and provide assistance as feasible and appropriate with the grant application process.

7.2.6 Capital Improvement Planning:

Both counties and many of the municipalities in the Lehigh Valley have capital improvements plans, identifying specific capital projects to be funded and completed according to a defined schedule. Some of these projects involve improvements to facilities and infrastructure that provide hazard mitigation benefits. As such, during this update process, the counties and municipalities have been encouraged to consider the mitigation benefits associated with their known or anticipated capital projects as a way to help prioritize their execution and to develop awareness that mitigation grants may be available to help fund such projects.

7.2.7 Housing and Urban Development (HUD) and Community Development Block Grant (CDBG) Funding:

HUD and CDBG funding may be available and used to support certain types of mitigation activities in the Lehigh Valley, including as identified in the 2012-2017 Northampton County Consolidated Plan.

During the annual plan evaluation process, the Steering Committee will identify additional policies, programs, practices, and procedures that could be modified to accommodate hazard mitigation actions, and include these findings and recommendations in the Annual HMP Progress Report.

7.3 Continued Public Involvement

Both counties and all participating municipalities have identified continued public outreach as high priority initiatives in their mitigation strategies (Section 9). Under these initiatives, the planning partnership will continue to maintain and provide links to the plan update's hazard mitigation webpage, continue to provide ongoing media releases and other public notifications regarding where the public can review the plan update and provide ongoing input, and may include public meetings to further promote awareness of the plan update.

Full copies of the plan update shall continue to be made available in hard-copy for review during normal business hours at the following locations:

Lehigh County Emergency Management Agency
640 W. Hamilton Street, 8th Floor
Allentown, PA 18101

Northampton County Emergency Mangement Services
100 Gracedale Road
Nazareth, PA 18064

Lehigh Valley Planning Commission
961 Marcon Boulevard, Suite 310
Allentown, PA 18109

Municipalities are asked to make available hard-copy excerpts of the plan update at their municipal building (e.g. clerk's office), including at a minimum the Introduction, applicable County annex and applicable municipal annex to the plan. Municipalities and the Steering Committee shall be responsible for receiving, tracking, and filing public comments regarding this plan update.

The public will have an opportunity to comment on the plan update as part of the annual plan review process and during the five-year plan update. Annual progress reports will be posted on the Lehigh Valley Hazard Mitigation Plan public website at http://www.nc911.org/html/hazard_mitigation.html. NCEMS will maintain this website, posting the annual progress reports and maintaining an active link to collect public comments.

The NCEMS Hazard Mitigation and Disaster Recovery Manager and Steering Committee are responsible for coordinating the collection and review of public comment, and ensuring their incorporation in the five-year plan update as appropriate.

Municipal mitigation planning representatives shall be responsible to assure that:

- Public comment and input on the plan update, and hazard mitigation in general, are recorded and addressed, as appropriate. Opportunity to comment on the plan update will be provided directly on the project web site.
- Copies of the latest approved plan (or draft in the case that the five year update effort is underway) are available for review at their municipal offices along with forms and instructions to facilitate public input and comment on the plan.

- Appropriate local links to the Lehigh Valley Hazard Mitigation Plan website are maintained. The website will be maintained throughout the course of the project, and during the plan update implementation phase.
- Public notices are made as appropriate to inform the public of the availability of the plan update, particularly during plan update cycles.

The NCEMS Hazard Mitigation and Disaster Recovery Manager shall be responsible to assure that:

- Public comment and input on the plan, and hazard mitigation in general, are recorded and addressed, as appropriate.
- The Lehigh Valley Hazard Mitigation Plan website is maintained and updated as appropriate.
- All public and stakeholder comments received are document and maintained.
- Copies of the latest approved plan (or draft in the case that the five-year update effort is underway) are available for review at the locations identified above, along with instructions to facilitate public input and comment on the plan.
- Public notices, including media releases, are made as appropriate to inform the public of the availability of the plan, particularly during plan update cycles.