

ADMINISTRATIVE PROCESS FOR “LINKAGE” TO THE HUMBOLDT OPERATIONAL AREA HAZARD MITIGATION PLAN

Even though the initial development of the Humboldt Operational Area Hazard Mitigation Plan (HOAHMP) included 26 planning partners, not all eligible local governments within the defined planning area are included in this plan. It is assumed that some or all of these non-participating local governments may chose to “link” to the HOAHMP at some point in time to gain eligibility for programs under the DMA. In addition, some of the current partnership may not continue to meet eligibility requirements due to the lack of active participation as prescribed by the plan. These “linkage” procedures will define the requirements established by the HOAHMP Steering Committee and all planning partners for dealing with the increase or decrease in planning partners linked to this plan. It should be noted that a currently non-participating jurisdiction within the defined planning area is not obligated to link to this plan. These jurisdictions can choose to do their own “complete” plan that addresses all required elements of section 201.6 of 44CFR.

Increasing the Partnership through Linkage

Any eligible jurisdiction wishing to link to the HOAHMP must complete all of the following steps:

1. The Steering Committee and Planning team has established an annual window for which linkage to the plan can occur. The window of opportunity to initiate the linkage process will be open from February 1st to the last calendar working day of April during any year. Linking jurisdictions are instructed to complete the following procedures during this time frame. All elements of this linkage procedure must be completed no later than April 30 of any given year.
2. The currently non-participating jurisdiction contacts the Humboldt Operational Area Point of Contact (HOAPOC) for the plan and requests a “Linkage Package”. The Humboldt Operational Area Point of Contact is:

Mr. Dan Larkin

Emergency Services Coordinator

Humboldt County Office of Emergency Services

826 4th street

Eureka, CA 95501

Phone#: (707) 268-2502

email: dlarkin@co.humboldt.ca.us

3. The HOAPOC will provide a linkage packages that includes:
 - Copy of Volume 1 and 2 of the plan (CDROM)
 - Planning partner’s expectations sheet.
 - A sample “letter of intent” to link to the HOAHMP.
 - A Special Purpose District or City template and instructions.
 - Catalog of Hazard Mitigation Alternatives

- A “request for technical assistance” form.
 - A copy of section 201.6 of Chapter 44, the Code of Federal Regulations (44CFR), which define the federal requirements for a Local Hazard Mitigation Plan.
4. The new jurisdiction will be required to review both volumes of the HOAHMP which includes the following key components for the planning area:
- The operational area risk assessment;
 - The plans goals and objectives;
 - Plan implementation and maintenance procedures;
 - Comprehensive review of alternatives; and
 - County-wide initiatives.

Once this review is complete, they will complete their jurisdiction specific annex by following the template and its instructions for completion provided by the HOAPOC. Technical assistance can be provided upon request by completing the request for technical assistance (TA) form provided in the linkage package. This TA may be provided by the HOAPOC or any other resource within the Planning Partnership such as a member of the Steering Committee or a currently participating City or Special Purposes District partner. The HOAPOC will determine who will provide the TA and the possible level of TA based on resources available at the time of the request.

5. The new jurisdiction will also be required to develop a public involvement strategy that ensures their public’s ability to participate in the plan development process. At a minimum, the new jurisdiction must make an attempt to solicit public opinion on hazard mitigation at the onset of this linkage process and a minimum of one public meeting to present their draft jurisdiction specific annex for comment, prior to adoption by the governing body. The Planning Partnership will have available resources to aid in the public involvement strategy such as the Plan website. However, it will be the new jurisdictions responsibility to implement and document this strategy for incorporation into their annex.

It should be noted that the Jurisdictional Annex templates ***do not*** include a section for the description of the public process. This is because the original partnership was covered under a uniform public involvement strategy that covered the operational area that is described in volume 1 of the plan. Since the new partner was not addressed by that strategy, they will have to initiate a new strategy, and add a description of that strategy to their annex. For consistency, new partners are encouraged to follow the public involvement format utilized by the initial planning effort as described in Volume 1 of the Regional plan.

6. Once their public involvement strategy is completed and they have completed their template, the new jurisdiction will submit the completed package to the HOAPOC for a pre-adoption review to ensure conformance with the Regional plan format.
7. The HOAPOC will review for the following:
- Documentation of Public Involvement strategy;
 - Conformance of template entries with guidelines outlined in instructions;
 - Chosen initiatives are consistent with goals, objectives and mitigation catalog of the Operational Area hazard mitigation plan;
 - A Designated point of contact; and

- A ranking of risk specific to the jurisdiction.

The HOAPOC may utilize members of the Steering Committee or other resources to complete this review. All proposed linked annexes will be submitted to the Steering Committee for their review and comment prior to submittal to the California Office of Emergency Services (CAOES).

8. Plans approved and accepted by the Steering Committee will then be forwarded to the CAOES for review with cover letter stating the forwarded plan meets local approved plan standards and whether the plan is submitted with local adoption or for criteria met/plan not adopted review.
9. CAOES will reviews plans for DMA2K compliance. Non-Compliant plans are returned to the Lead agency for correction. Compliant plans are forwarded to FEMA Region IX office for review with annotation as to the adoption status.
10. FEMA Region IX reviews the new jurisdiction's plan in association with the approved plan to ensure DMA compliance. Region IX notifies new jurisdiction of results of review with copies to CAOES and approved planning authority.
11. New jurisdiction corrects plans shortfalls (if necessary) and resubmits to CAOES through the approved plan lead agency.
12. For plans with no shortfalls from the Region IX review that have not been adopted, the new jurisdiction governing authority adopts the plan (if not already accomplished) and forwards adoption resolution to Region IX with copies to lead agency and CAOES.
13. Region IX Director notifies new jurisdiction governing authority of plan approval.

The new jurisdiction plan is then included with the Regional plan with the commitment from the new jurisdiction to participate in the on-going plan implementation and maintenance.

Decreasing the Partnership

The eligibility afforded under this process to the planning partnership can be rescinded in two ways. First, a participating planning partner can voluntarily ask to be removed from the partnership. This may be done because the partner has decided to develop their own plan or has identified a different planning process for which they can gain eligibility. For what ever the reason, a partner that wishes to voluntarily leave the partnership, shall inform the HOAPOC of this desire in writing. This notification can occur any time during the calendar year. A jurisdiction wishing to pursue this avenue is advised to make sure they are deemed eligible under the new planning effort, before they initiate this action to avoid any period where they would be considered non-complaint with the Disaster Mitigation Act.

Once the HOAPOC has received this notification, they shall immediately notify both CAOES and FEMA Region IX in writing that the partner in question is no longer covered by the HOAHMP, and that the eligibility afforded that partner under this plan should be rescinded based on this notification.

The second way a partner can be removed from the partnership is by failure to meet the participation requirements specified in the "Planning Partner Expectations" package provided to each partner at the beginning of the process, or the plan maintenance and implementation procedures specified under chapter 7 or Volume 1 of the plan. It should be noted, that each partner agreed to these specified terms by adopting the plan.

Eligibility status of the planning partnership will be monitored by the HOAPOC. The determination of whether a partner is not meeting its participation requirements will be based on the following parameters:

- Are annual progress reports being submitted annually by the specified time frames?

- Are partners notifying the HOAPOC of changes in designated points of contact?
- Are the partners supporting the Steering Committee by attending designated meetings or responding to needs identified by the body?
- Are the partners continuing to be supportive as specified in the Planning Partners expectations package provided to them at the beginning of the process?

The point here is that participation in the effort does not end with plan approval. This partnership was formed on the premise that a group of planning partners would pool resources and work together to strive to reduce risk within the operational area. Failure to support this premise, lessen the effectiveness of this effort. The following procedures will be followed to remove a partner due to the lack of participation:

1. The HOAPOC will advise the Steering Committee of this pending action and provide evidence or justification for the action. Examples of justification may include: multiple failures to submit annual progress reports, failure to attend meetings determined to be mandatory by the Steering Committee, unable to contact designated staff at a minimum of 5 attempts, or failure to act on their action plan.
2. The Steering Committee will review information provided by HOAPOC, and determine action by a vote. The Steering Committee will invoke the voting process established in the ground rules established during the formation of this body.
3. Once the Steering Committee has approved an action, the HOAPOC will notify the planning partner of the pending action in writing via certified mail. This notification will outline the grounds for the action, and ask the partner if it is their desire to remain as a partner. This notification shall also clearly identify the ramifications of removal from the partnership. The partner will be given 30 days to respond to the notification.
4. Confirmation by the partner that they no longer wish to participate or failure to respond to the notification shall trigger the procedures for voluntary removal discussed above.
5. Should the partner respond that they would like to continue participation in the partnership, they must clearly articulate an action plan to address the deficiencies identified by the HOAPOC. This action plan shall be reviewed by the Steering Committee to determine whether the actions are appropriate to rescind the action. Those partners that satisfy the Steering Committee's review will remain in the partnership, and no further action is required.
6. Automatic removal from the partnership will be implemented for partners where these actions have to be initiated more than once in a 5 year planning cycle.