



FEMA Requirement A2: Stakeholder Engagement

Does the Plan document an opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, agencies that have the authority to regulate development as well as other interests to be involved in the planning process?

Local Mitigation Plan Review Guide, FEMA, 2011, page 15

This “Good Practice” document is intended to help plan developers understand the FEMA requirement related to engaging interested parties in the development or update of a hazard mitigation plan. This can be a challenging requirement to fulfill. Fortunately, even minor adjustments in approach can make all the difference in developing a meaningful plan.

Common Reasons Why FEMA Returns Plans for A2 Revisions

1. Stakeholders are not specifically identified who were (a) invited to become involved in plan development, and (b) those who actually participated.
2. The stakeholders solicited did not include regulatory agencies, nearby communities, and local and regional agencies involved in mitigation.

Tip: Don’t forget to invite the participation of adjacent communities (municipal or tribal) in bordering counties or states.

Tip: Make sure to solicit input from local, state, county, and federal agencies regulating activity within the community or surrounding areas. Such regulation could be related to mitigation through environment protection, land use controls, housing, economic development, redevelopment, infrastructure, public transportation or other public services. Agencies managing land holdings may have especially valuable insights and concerns.

Tip: Solicit the involvement of local and regional agencies even those with strictly administrative, contractual, or advisory roles. Their staff may recognize issues and offer solutions.

Tip: Private and non-profit entities may have a unique understanding of social and economic vulnerabilities while also being affected by plan

implementation. Request the participation of private business (especially major employers, those holding real estate, or business organizations), academic institutions, non-profits, and community groups.

Tip: Invite the input of individuals potentially impacted or possibly affecting vulnerability to hazards - for example, managers of a sewage treatment plant in the floodplain or the owner of a deteriorating dam.

3. The plan description of one or more participating stakeholders lacks both their agency/organization name and the titles of their involved representatives.
4. The planning process as explained does not show a method by which stakeholders were *informed how to participate*. Press releases, public notices, website postings, email, and notification letters used to contact stakeholders did not describe how they could provide comments or otherwise take part in the planning process.
Note: Issuing a notice that a plan is available for viewing is not the same as soliciting input.

Tip: Ensure that publicity during plan development includes instructions to stakeholders and the public on how to submit input. Provide copies of newspaper coverage, press releases, public notices, website postings, emails, and notification letters to document that stakeholders were informed how to take part.

Tip: Remember to document the kind of input received, if any, and note if none was contributed during plan development. This adds to the plan's explanation of how the stakeholders were given a chance to contribute. More importantly, it is a good reminder to demonstrate to stakeholders that their contributions made a difference.

Tip: Engage stakeholders early within the *current* planning cycle, and do not rely upon previous involvement in prior plans and updates. Collecting input early can make a difference in shaping the mitigation strategy.
(See also Requirement A3)

Plans Demonstrating Good Practice for Requirement A2

This section provides an example of how a jurisdiction engaged stakeholders in a way that demonstrates good practice with a range of stakeholders and their involvement in plan development. The abstract is preceded by a brief explanation of why this plan section meets the requirements. Practices going "Beyond Minimum Requirements" are also noted. Many other approaches are possible, so don't be limited by these examples; the approach taken should fit the particular circumstances of the community.

Example: City of Cranston, RI Multi-Hazard Mitigation Strategy (2015)**Why This Plan Demonstrates Good Practice**

1. The community formed a hazard mitigation (plan) committee that includes two of the three minimum types of stakeholders that the requirement specifies must be given an opportunity to be involved in plan development. Cranston included their Planning Department and Building Inspector, who are involved in regulation of development; and the Public Works Department involved in mitigation project implementation. The plan described how Committee members participated in the update process, documenting meetings attended and agendas (also relevant to Requirement A1).
2. The third “minimum” type of stakeholder, neighboring communities, was given an opportunity to be involved in the planning process as described in the example’s Section 1.4, although these did not participate on the hazard mitigation committee.
3. Three other stakeholders and their representatives are identified as serving on the hazard mitigation committee.
Beyond Minimum Requirements: The community engaged stakeholders in local/regional businesses and the Chamber of Commerce, thus providing for their direct, active representation.
4. **Beyond Minimum Requirements:** The plan notes that Cranston used contributions made to prior plans by a number of interests with a stake in mitigation as described at the end of Section 1.3 of the abstract.
Note: While smaller communities may have more limited numbers of stakeholders, every community should reach out to a wide diversity of groups and individuals for information, advice, and/or other input.
5. Appendix K (14 pages not included here) documents how the public, including other stakeholders, was invited through media coverage to participate through media coverage. (Also relevant to Requirement A3).
Note: Plans can be further improved by also explaining which current stakeholders participated in the former planning process or were new stakeholders in the current update process.

See Abstract on following pages.

Abstract from pages 2-3***City of Cranston, RI Multi-Hazard Mitigation Strategy (2015)******1.3 Cranston Hazard Mitigation Committee***

This Hazard Mitigation Plan (HMP) is a product of the Cranston Hazard Mitigation Committee (CHMC). Committee members included:

Peter Lapolla - Planning Director, Cranston Department of Planning and National Flood Insurance Program Coordinator; Hazard Mitigation Committee Chair
Mario Aceto - Cranston Councilman
Stephen Boyle - Cranston Chamber of Commerce
Lawrence DiBoni - Director, Cranston Department of Economic Development
Ed Greene - Sage Business Solutions
Hy Goldman - Greylawn Food Corporation
Kenneth Mason - Director, Cranston Public Works
William McKenna - Chief, Cranston Fire Department and Emergency Management Agency
Marco Palumbo - Cranston Police
Jason Pezzulo - Cranston Planning
Stanley Pikul - Director of Building Inspections, Cranston

In addition, the CHMC benefited from previous contributions of the Cranston Tax Assessors Office, Planning Department, School Department, Recreation Department, Historic District Commission, Engineering Division, Harbormaster and Housing Authority; the United States Department of Agriculture Natural Resource Conservation Service; the American Red Cross; Narragansett Electric; Veolia Water; the Providence Water Supply Board; Cox Communications; and Verizon as well as from the Rhode Island Emergency Management Agency and the Federal Emergency Management Agency. These entities were not only instrumental in inventorying pertinent facilities and in identifying risks but also in reviewing proposed mitigation actions and implementation plans.

1.4 The Planning Process

This update of the 2015 HMP is the result of a seven step process. It was initiated on September 16, 2013 with the establishment of the CHMC by the City Mayor and the dedication of technical support staff from the City's Planning Department. Step two started the plan update process and included the first meeting of the CHMC on November 22, 2013 which focused on re-ranking hazards and discussing the process for updating the plan. The resulting process is summarized below for convenience and detailed procedural methodologies are presented within the plan's respective chapters. (See Chapter 7 for a more detailed description of both the planning and the public participation process by which the 2015 update of the HMP was completed.)

Continued on next page...

Abstract from pages 2-3***City of Cranston, RI Multi-Hazard Mitigation Strategy (2015)****Continued:*

Step three began with the CHMC reviewing the hazards of concerns identified in the 2010 HMP on December 18, 2013 documenting their historical occurrences and reassessing the likelihood of future events as set forth in the plan. Follow-up meetings of the CHMC were held to finalize its review which is presented in Chapter Two.

Step four involved the review of the assessment of risk identified in the 2010 HMP and which was undertaken through two meetings of the CHMC designed to identify those elements of concern within the City. On December 18, 2013 and January 29, 2014 the CHMC reviewed and updated detailed facility inventories, mapped the concerns, generated fiscal and population impact analyses, determined the level of risk and produced a draft risk assessment matrix.

Step five entailed the CHMC reviewing and adjusting the 2010 HMP hazard mitigation mission statement, specific mitigation goals and individual mitigation actions. As above, a CHMC a brainstorming session was used to provide a starting point for the CHMC's efforts. Follow-up meetings of the CHMC were then held to review the drafts and finalize the content of Chapters Four and Five.

Step six focused on the prioritization of the mitigation actions and the development of the implementation, evaluation and revision schedule. This prioritization was completed through individual review of the draft actions and updating the 2015 HMP.

Step seven furthered the public input and review process with the presentation to the City Planning Commission and the general public for review and comment. The HMP was also emailed to Emergency Management Directors in the neighboring towns of Warwick, West Warwick, Providence, Coventry, Johnston, and Scituate for their review and comments. Under the direction of the City's Planning Director, the City's consultant made suggested edits to the HMP and submitted complete first drafts to the Rhode Island for review in June 2014. A final copy was sent to the Federal Emergency Management Agency on February 25, 2015.

A2 Regulatory Guidance

Abstracts from *Code of Federal Regulations and Local Mitigation Plan Review Guide, October 1, 2011*

Element A2 Regulation [§201.6(b) (2)] (page 14)

An open public involvement process is essential to the development of an effective plan. In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process shall include (2) an opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development, as well as businesses, academia and other private and non-profit interests to be involved in the planning process.

Element Intent (page 16)

To demonstrate a deliberative planning process that involves stakeholders with the data and expertise needed to develop the plan, with responsibility or authority to implement hazard mitigation activities, and who will be most affected by the plan's outcomes.

Element Requirements (page 15-16)

- a. The plan **must** identify all stakeholders involved or given an opportunity to be involved in the planning process. At a minimum, stakeholders **must** include:
 1. Local and regional agencies involved in hazard mitigation activities;
 2. Agencies that have the authority to regulate development; and
 3. Neighboring communities.

*An **opportunity to be involved in the planning process** means that the stakeholders are engaged or invited as participants and given the chance to provide input to affect the plan's content.*

- b. The plan **must** provide the agency or organization represented and the person's position or title within the agency;
- c. The plan **must** identify how the stakeholders were invited to participate in the process. Examples of stakeholders include, but are not limited to:
 - Local and regional agencies involved in hazard mitigation include public works, zoning, emergency management, local floodplain administrators, special districts, and GIS departments.
 - Agencies that have the authority to regulate development include planning and community development departments, building officials, planning commissions, or other elected officials.
 - Neighboring communities include adjacent counties and municipalities, such as those that are affected by similar hazard events or may be partners in hazard mitigation and response activities.
 - Other interests may be defined by each jurisdiction and will vary with each one. These include, but are not limited to, business, academia, and other private and non-profit interests depending on the unique characteristics of the community.

Check Out These Additional Aids

Local Mitigation Plan Review Guide, October 2011

<http://www.fema.gov/media-library/assets/documents/23194>

Local Mitigation Planning Handbook, March 2013 (pages 2-1 through 2-6)

<http://www.fema.gov/media-library/assets/documents/31598>