Integrating Community Wildfire Protection Plans into Natural Hazard Mitigation Plans **DRAFT**

Introduction

Natural Hazard Mitigation Plans (NHMP) and Community Wildfire Protection Plans (CWPP) both benefit communities striving to reduce risk to natural hazards. Though one plan is focused on the wildfire hazard and other is focused on multi-natural hazards, the requirements of what needs to be in the plans have a lot of similarities. As a result of the similarities, many communities have chosen to integrate the two planning documents. This paper will highlight the benefits of integration and steps communities can take to integrate their current NHMP and CWPP.

Background

Natural Hazard Mitigation Plans

- Disaster Mitigation Act of 2000
 - Establishes eligibility for FEMA Hazard Mitigation Assistance (HMA)
 - Requires Tribal, State, and local governments to submit plan to FEMA for review
- Title 44 Code of Federal Regulations (CFR) 201.6 or 201.7
 - Publishes requirements for approval of a local or Tribal mitigation plan
- FEMA administers the Mitigation Planning Program
- FEMA works with State Emergency Management in delivery of guidance, technical assistance, training, and plan reviews.

Community Wildfire Protection Plans

- Healthy Forests Restoration Act (HFRA) of 2003
 - Established eligibility and provided prioritization for National Fire Plan funds
 - Requires communities to submit a plan to State Forestry Agencies for approval
- CWPP Guidance was created by a collaborative group including local, state, and federal agencies and individuals from across the United States
- The Handbook was sponsored Communities
 Committee, Society of American Foresters, National
 Association of Counties, National Association of
 State Foresters, and Western Governors' Association.

Natural Hazard Mitigation Plans

State, tribal and local governments are required to develop a hazard mitigation plan as a condition for receiving certain types of non-emergency disaster assistance, including funding for mitigation projects. The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93-288), as amended by the Disaster Mitigation Act of 2000, provides the legal basis for state, local and tribal governments to undertake a risk-based approach to reducing risks from natural hazards through mitigation planning.

The requirements and procedures for state, tribal and local mitigation plans are found in the Code of Federal Regulations (CFR) at Title 44, Chapter 1, Part 201 (44 CFR Part 201).

The Federal Emergency Management Agency (FEMA) manages the Hazard Mitigation Planning Program. FEMA provides guidance, training, technical assistance, and review of all NHMPs. FEMA works through the State Hazard Mitigation Officers located in State Emergency Management Departments.

Community Wildfire Protection Plans

The Healthy Forests Restoration Act (HFRA) of 2003 provided communities with a tremendous opportunity to influence where and how federal agencies implement fuel reduction projects on federal lands. This landmark legislation includes the first meaningful statutory incentives for the US Forest Service (USFS) and the Bureau of Land Management (BLM) to give consideration to the priorities of local communities as they develop and implement forest management and hazardous fuel reduction projects.

In order for a community to take full advantage of this new opportunity, it must first prepare a Community Wildfire Protection Plan (CWPP). Local wildfire protection plans can take a variety of forms, based on the needs of the people

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involved in their development. Community Wildfire Protection Plans may address issues such as wildfire response, hazard mitigation, community preparedness, or structure protection—or all of the above.

CWPP Guidance was created by a collaborative group including local, state, and federal agencies and individuals from across the United States. The Handbook was sponsored Communities Committee, Society of American Foresters, National Association of Counties, National Association of State Foresters, and Western Governors' Association. CWPPs are reviewed by individuals in State Forestry Agencies.

Benefits

There are a number of benefits to integrating CWPPs into NHMPs.

- Consistent Updates/Maintenance: NHMPs are required to be updated every 5 years. CWPPs project lists are
 required to be reviewed each year, but the planning process/development does not have timeline. Integrating
 the CWPP into the NHMP means the CWPP will be updated within the past 5 years (or the life of the plan).
 According to FEMA regulations, a CWPP that was done in 2007 cannot be used for a plan being updated in 2014
 since the CWPP was not updated in the past 5 years.
- 2. **Funding Plans**: A community that updates a CWPP while updating the NHMP may be eligible to use FEMA mitigation planning grant to update significant portions of a CWPP, providing a savings to the local communities. In addition, funding resources for CWPPs is becoming more difficult to obtain, which is why using FEMA mitigation planning grants becomes a great resource.
- 3. **Planning Process**: Combing the planning processes for both plans allows group to avoid duplication of efforts when creating committees, conducting risk assessments and identifying strategies. The singular process allows for streamlined scheduling, Messaging can be aligned as a result of a single planning process.
- 4. **Hazard Interdependencies**: CWPPs focus on the wildfire hazard. Wildfires are not isolated hazards and can increase the risk to future debris floods, flooding, or erosion. Since the NHMPs focus on all natural hazards and their interdependencies, the integration of plans benefits with an enriched discussion and analysis on all the hazards.
- 5. **Collaboration**: A key element in both NHMP and CWPP planning should be the meaningful discussion they promote among community members regarding mitigation, fire protection, and forest management practices. The opportunity to integrate the plans ensures that all jurisdictions, organizations, and individuals who are championing mitigation are collaborating. For example, the jurisdictions can either create a larger mitigation committee to address all hazards or have a smaller mitigation committee with a wildfire subject matter subcommittee to ensure that all local mitigation experts are part of the dialogue.
- 6. **Leveraging Resources**: Since NHMPs are generally at a larger scale (County or City) and CWPPs are sometimes at a smaller scale (neighborhood or fire district), the opportunity to leverage resources throughout a jurisdiction increases through the NHMP development/maintenance process. Neighborhood groups that want enact change to city or county policy may have a difficult time when developing neighborhood level plans. Integrating with the city or county's mitigation plan provides the opportunity to work with staff that could influence change. In addition, counties that develop plans may not consider the neighborhood level needs, thus incorporating neighborhood groups provides an opportunity to understand homeowner issues.
- 7. **Jurisdiction Eligibility**: As a result of the two plans being integrated and on the same timeline, jurisdictions that participated in the plan development maintain eligibility for both National Fire Plan funds and FEMA Hazard Mitigation Assistance grants.

Integration Scenarios

There is no "right" way to integrate the NHMP and CWPP. That will be for the communities to decide. Here are a few options that might be considered.

Option 1: Make your CWPP a stand-alone chapter/volume of your NHMP

Communities can develop a stand-alone CWPP and include the plan as either a separate volume or chapter in the NHMP.

Example NHMP Outline

Executive Summary

Chapter 1: earthquake Hazard Profile and Mitigation Strategies

Chapter 2: Flood Hazard Profile and Mitigation Strategies

Chapter 3: Severe Weather Hazard Profile and Mitigation Strategies

Chapter 4: Community Wildfire Protection Plan (CWPP)

Annexes: Other NHMP Requirements

Option 2: Maintain a free-standing CWPP and use sections of it in your NHMP.

The CWPP Base Map and Risk Assessment become your NHMP Wildfire Hazard Profile. CWPP Priorities and Action Plan are incorporated into the Mitigation Strategy section of the NHMP in their entirety or by reference.

Option 3: Single Unified Plan that meets CWPP and NHMP Requirements

Integrate the CWPP requirements throughout the NHMP; do not maintain a separate CWPP. The comparison tool on the next page provides opportunities on how to create a single plan meeting both requirements.

Plan Maintenance: If you choose to maintain two documents, Best Practices dictates that the CWPP and the NHMP be linked via the plan maintenance protocols defined in each document, where all updates to the NHMP include a comprehensive review and, if necessary, update to the CWPP and vice versa.

General comparison of Natural Hazard Mitigation Plan and Community Wildfire Protection Plan

Local Hazard Mitigation Plan	Community Wildfire Protection Plan Steps	CWPP/NHMP Integration Guidance
201.6(b) – Planning process shall provide an opportunity for the public to comment on plan in drafting stage and prior to plan approval; provide an opportunity for involvement of neighboring communities, business, academia, and others; and review and incorporate existing plans, studies, reports, technical information.	Convene Decision Makers – Local Government, Local Fire Departments, State Forestry Agency, Indian Tribes, etc.	Minimum: Incorporate with NHMP Process
	Involve Federal Agencies – U.S. Forest Service, Bureau of Land Management, Bureau of Indian Affairs, Department of Interior, etc.	Minimum: Incorporate w/NHMP Process. Add USFS, BLM, BIA, ODF and other forestry stakeholders to Steering Committee. Ideal: Establish a CWPP subcommittee to assist in the CWPP update.
	Engage Interested Parties – Neighborhood Associations, Community Groups, others with interest in forest management.	Minimum: Involve Communities at Risk and/or Firewise Communities in the NHMP update outreach process. Ideal: Reach out to high-priority CAR's to educate them on their risk and mitigation opportunities.
201.6(c)(2) – Risk Assessment. The plan shall describe the natural hazards that can affect the jurisdiction, describe the location and extent of these natural hazards, and include information on previous occurrences and on the probability of future hazard events. The plan shall describe the jurisdiction's vulnerability to identified hazards, including a summary of each hazard and its impact on the community. The plan should describe vulnerability in terms of the types and numbers of existing and future buildings, infrastructure, and critical facilities in the identified hazard area, and it should estimate potential dollar	4. Establish a Community Base Map – Identify inhabited areas at risk, critical human infrastructure, designate wildland fire-urban interface, identify Communities at Risk.	Minimum: Use State WWRA Data output for inhabited areas, the WUI, and CARS. Ideal: Refine State WUI designation with local data/knowledge. ID, map, and prioritize CARS to improve State listing.
	 5. Develop a Community Risk Assessment a) Evaluate Fuel Hazards b) Risk of Wildfire Occurrence c) Homes, Business, Essential Infrastructure at Risk d) Other Community Values at Risk 	Minimum: Use State WWRA Data layers. Incorporate with NHMP Process. Ideal: Refine State WWRA data with local data/knowledge.

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losses to vulnerable structures and describe the methodology used. The Plan should provide a general description of land uses and development trends.	e) Local Preparedness, Firefighting Capability	
201.6(c)(3) – Mitigation Strategy. The plan shall describe goals to reduce or avoid long-term vulnerabilities to identified hazards, shall identify and analyze mitigations actions and projects being considered, and shall describe how identified mitigation actions will be prioritized, implemented and administered.	6. Establish Fuels Reduction Priorities, Recommendations to Reduce Structural Ignitability, ID Local Response Capability Needs – Establish whether projects protect community/infrastructure or other community values.	Minimum: Incorporate with NHMP Process. Ideal: Include an action plan for each CAR to help create more Fire Adapted Communities.
	Develop Action Plan and Assessment Strategy – Identify agencies responsible for implementation, timeline, funding.	
201.6(c)(5) – The plan must document formal adoption by the governing body of the jurisdiction.	8. Finalize Community Wildfire Protection Plan – Core planning team agree on action plan. HFRA requires that three entities must mutually agree to the final contents of a CWPP:	Minimum: Incorporate with NHMP Process. Ideal: Schedule a formal signature event for the CWPP.
	 ✓ The applicable local government (i.e., counties or cities); ✓ The local fire department(s); and ✓ The state entity responsible for forest management. 	
Other requirements: Describe process for maintaining plan on five-year cycle, for incorporating requirements of plan into other planning mechanisms (i.e., land-use planning, CWPP), and for continued public involvement.		Minimum: Incorporate with NHMP Process Ideal: Tie all CWPP elements to the 3 elements to the Cohesive Wildland Strategy.

Contact

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