

Section 7

Plan Maintenance Requirements

Monitoring, Evaluating, and Updating the Plan---Requirement §201.7(c)(4)(i):

[The plan maintenance process **shall** include a] section describing the method and schedule of monitoring, evaluating, and updating the mitigation plan.

- Does the new or updated plan describe the method and schedule for **monitoring** the plan, including how, when, and by whom (e.g., the responsible agency)?
- Does the new or updated plan describe the method and schedule for **evaluating** the plan, including how, when, and by whom (e.g., the responsible agency)?
- Does the new or updated plan describe the method and schedule for **updating** the plan, including how, when, and by whom (e.g., the responsible agency) within the five-year cycle?
- Does the updated plan include an analysis of whether the previously approved plan's method and schedule worked, and what elements or processes, if any, were changed for the next 5 years?

Monitoring Progress of Mitigation Activities---Requirement §201.7(c)(4)(ii):

[The plan maintenance process **shall** include a] system for monitoring implementation of mitigation measures and project closeouts

Requirement §201.7(c)(4)(v):

[The plan maintenance process **shall** include a] system for reviewing progress on achieving goals as well as activities and projects identified in the mitigation strategy.

- Does the new or updated plan describe how mitigation measures and project closeouts will be **monitored**?
- Does the new or updated plan identify a **system for reviewing progress** on achieving goals and implementing activities and projects in the Mitigation Strategy?
- Does the updated plan describe any modifications, if any, to the system identified in the previously approved plan to track the initiation, status, and completion of mitigation activities?
- Does the updated plan discuss whether mitigation actions were implemented as planned?

Incorporation into Existing Planning Mechanisms---Requirement §201.7(c)(4) (iii):

[The plan maintenance process **shall** include a] process by which Indian Tribal government incorporates the requirements of the mitigation plan into other planning mechanisms such as reservation master plans or capital improvement plans, when appropriate...

- Does the new or updated identify other tribal planning mechanisms available for incorporating the requirements of the mitigation plan?
- Does the new or updated plan include a **process by which the Indian Tribal government will incorporate the mitigation strategy** and other information contained in the plan (e.g., risk assessment) into other planning mechanisms, when appropriate?

Continued Member and Stakeholder Involvement---Requirement §201.7(c)(4) (iv):

[The plan maintenance process **shall** include a] discussion on how the Indian Tribal government will continue public participation in the plan maintenance process.

- Does the new or updated plan explain how **continued public participation** will be obtained? (For example, will there be public notices, an on-going mitigation plan committee, or annual review meetings with stakeholders?)

Prerequisites

Adoption by the Tribal Governing Body (Single Indian Tribal government)---Requirement §201.7(c) (5)

The plan must be formally adopted by the governing body of the Indian Tribal government prior to submitting to FEMA for final review and approval.

Requirement §201.7(c) (6)

[The plan must include] assurances that the Indian Tribal government will comply with all applicable Federal statutes and regulations in effect with respect to the periods for which it receives grant funding, in compliance with 14.11(c) of this chapter. The Indian Tribal government will amend its plan whenever necessary to reflect changes in tribal or Federal laws and statutes as required in 13.11(d) of this chapter.

- Has the Indian tribal governing body formally adopted the new or updated plan?
 - Is supporting documentation, such as a resolution, included with the new or updated plan?
 - Does the new or updated plan provide assurances that the Indian Tribal government will continue to comply with all applicable Federal statutes and regulations during the periods for which it receives grant funding, in compliance with 44 CFR 13.11 (c), and will amend its plan whenever necessary to reflect changes in tribal or Federal laws and statutes as required in 44 CFR 3.11 (d)?
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**PUYALLUP TRIBE ALL HAZARD MITIGATION PLAN
2017-2022 EDITION
PLAN MAINTENANCE PROCEDURES**

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The planning process undertaken for this update during the last 14 months continues the foundation of breaking the disaster cycle by planning for a disaster resistant Puyallup Tribe of Indians. This section details the formal process that will guarantee the Puyallup Tribe of Indians All-Hazard Mitigation Plan remains an active and relevant document. The Plan Maintenance Section includes a description of the documentation citing the plan's formal adoption by the Puyallup Tribe of Indians. The section also describes: the method and schedule of monitoring, evaluating, and updating within a five-year cycle; the process for incorporating the mitigation strategy into existing mechanisms; and the process for integrating public participation throughout the plan maintenance. The section serves as a guide for implementation of the hazard mitigation strategy.

The Plan Maintenance Section is divided into three separate parts:

1. Plan Adoption
2. Maintenance Strategy
3. Continued Public Involvement

Plan Adoption

Upon completion of the Puyallup Tribe of Indians All Hazard Mitigation Plan it will be submitted to Washington State Emergency Management Division (WA-EMD) for a Pre-Adoption Review. The WA-EMD has 30 days to then take action on the plan and forward it to the Federal Emergency Management Agency (FEMA) Region X for review. This review, which is allowed 45 days by law, will address the federal criteria outlined in FEMA Interim Final Rule 44 CFR Part 201.7. When the Tribe Plan is submitted for each Pre-Adoption Review, Washington State EMD and/or FEMA Region X may request revisions. In completing this review there may be revisions requested by WA-EMD and/or FEMA. Revisions could include changes to background information, editorial comments, and the alteration of technical content. The Public Safety Director will call a Planning Team Meeting to address any revisions needed and resubmit the changes.

The Tribal Council is responsible for the Tribe's adoption of the Plan after the Pre-Adoption Review by WA-EMD and the FEMA Region X. Once the Tribe adopts the plan, the Public Safety Director will be responsible for submitting a copy of the Council Determination Report (CDR)/resolution, to the State Hazard Mitigation Officer at the Washington State EMD and to FEMA Region X for final approval. Upon approval by FEMA, the Tribe will gain eligibility for both Hazard Mitigation Grant Program and Pre-Disaster Mitigation Grant Program funds.

Appendix A will list the dates of Washington State EMD and FEMA Region X approval of the Tribe Plan. A copy of the CDR will be attached in Appendix A following State and FEMA approval. Appendix E will be used to track changes and/or updates.

Maintenance Strategy

The Tribe's maintenance strategy for implementation, monitoring, and evaluation provides a structure that encourages collaboration, information transference, and innovation. Through a multi-tiered implementation method, the Tribe will provide its citizens a highly localized approach to loss reduction while serving their needs through coordinated policies and programs.

The method's emphasis on all levels of participation promotes public involvement and adaptability to changing risks and vulnerabilities. Finally, it will provide a tangible link between citizens and the various levels of government service, ranging from community action to the Department of Homeland Security. Through this strategy, the Tribe will continue to break the disaster cycle and achieve a more disaster resistant community.

Implementation

In order to ensure efficient and effective implementation, the Puyallup Tribe of Indians will make use of its capabilities, infrastructure, and dedicated population. The Tribe will implement its mitigation strategy over the next five years primarily through the annual Tribal budget process and varying grant application processes. All programs and entities identified in the Capability Assessment will serve as the implementing mechanisms within those processes.

The Tribal Administration will work in conjunction with those departments identified in both the capability assessment and under each mitigation measure to initiate the mitigation strategy. For example, any regulatory and land use measures will continue to be implemented through collaboration with the Tribe's Planning Department and its creation and updates to the Tribe's Comprehensive Land Use Plan. Other measures will be implemented through collaboration with the identified jurisdictions/departments listed under each measure's evaluation and through the mechanisms and funding sources identified in the Capability Assessment Section.

These efforts fall under a broader implementation strategy that represents a regional effort. This strategy must be adaptable to change while being consistent in its delivery.

The mitigation implementation strategy is a three-tiered method that emphasizes localized needs and vulnerabilities while addressing Tribal and multi-jurisdictional policies and programs. The first tier is implementation through existing Public Education Programs in the Planning Area (i.e. at the individual level through community meetings and at the neighborhood level through PC NET). The second, Tribal Administration will create a service area-wide mechanism for implementation, in this case the Emergency Management Committee (EMC). The third tier is a more external and multi-jurisdictional mechanism, the Hazard Mitigation Forum (HMF).

This method ensures that implementation speaks to unique vulnerabilities at the most local level, allows for coordination among and between levels, and promotes collaboration and innovation. Further, it provides a structured system of monitoring implementation. Finally, it is a method that can adapt to the changing vulnerabilities of the Tribe, the region, and the times. These three levels and their means of implementation and collaboration are described below.

Public Education Programs

At the individual citizen level, Public Education Programs provide the Tribe with a localized mechanism for implementation. This approach to mitigation can adapt to the varying vulnerabilities and needs within a growing region. Public Education Programs are also a means for involving the public in mitigation policy development. Currently the Tribe pursues a variety of mitigation-related programs that help citizens to better prepare for and respond to disasters. For example, currently within the Planning Area's boundaries a relationship has been established with Pierce County Emergency Management in forming Pierce County Neighborhood

Emergency Teams (PC NET) to better prepare for, and respond to, disasters. PC NETs provide a coordinated group of communities through which individuals can implement home and neighborhood level mitigation measures.

Jurisdiction-Wide: Emergency Management Committee

The Tribal Emergency Management Committee will be the body responsible for determining the direction of the Plan's implementation. The EMC would be composed of representatives from many of the entities identified in the Capability Assessment Section as having a role in hazard mitigation. The EMC would ultimately provide a mechanism for coordination among those departments engaged in mitigation to ensure that a comprehensive and efficient approach be undertaken in the Tribe's efforts at all-hazards mitigation.

Initially, the EMC will be responsible for the overall review of the plan and will designate mitigation measures to those departments responsible for their implementation. This will be done with assistance from both the Tribal Administrator and the Public Safety Director. The EMC will address the Plan on an annual basis during the month of October. Public Safety will monitor the plan's implementation throughout the year and report to the Administration at this annual meeting. Evaluation and updates will be completed at this meeting. Recommendations will be made to coincide with the normal budgeting processes and provide an ample time period for review and adoption of any necessary changes to the implementation schedule.

The EMC will also be responsible for grant application and distribution. These efforts will be led by Tribal Administration.

Hazard Mitigation Forum

The Pierce County Hazard Mitigation Forum (PC-HMF) represents a broader and multi-jurisdictional, multi-organizational approach to mitigation implementation. The PC-HMF will be comprised of all representatives from unincorporated Pierce County and all jurisdictions and organizations, partially or wholly, within its borders that have undertaken mitigation planning efforts. The PC-HMF will serve as the coordinating body for projects of a multi-jurisdictional nature and will provide a mechanism to share successes and increase the cooperation necessary to break the disaster cycle and achieve a disaster resistant region. Members of the PC-HMF will include the following jurisdictions who have completed, or who have begun the process of completing, DMA 2000 compliant plans:

- Puyallup Tribe of Indians
- City of Bonney Lake
- City of DuPont
- City of Fife
- City of Gig Harbor
- City of Milton
- City of Roy
- City of Puyallup
- City of Tacoma
- Town of Eatonville
- City of Buckley
- City of Edgewood
- City of Fircrest
- City of Lakewood
- City of Orting
- City of Sumner
- City of University Place
- Town of Carbonado
- Town of South Prairie
- Town of Wilkeson

- Town of Steilacoom
- Unincorporated Pierce County
- East Pierce Fire and Rescue
- Graham Fire and Rescue
- Orting Valley Fire and Rescue
- Pierce County Fire District 14
- Pierce County Fire District 27
- West Pierce Fire and Rescue
- Clover Park School District
- Eatonville School District
- Franklin Pierce School District
- Pacific Lutheran University
- Puyallup School District
- Sumner School District
- University Place School District
- Crystal River Ranch HOA
- Herron Island HOA
- Pierce Transit
- Raft Island HOA
- Taylor Bay Beach Club
- Firgrove Mutual Water Company
- Graham Hill Mutual Water Company
- Lakewood Water District
- Ohop Mutual Light Company
- Spanaway Water Company
- Tanner Electric
- Cascade Regional Blood Services
- Dynamic Partners
- Group Health
- MultiCare Health System
- Central Pierce Fire and Rescue
- Gig Harbor Fire and Medic One
- Key Peninsula Fire Department
- Pierce County Fire District 13
- Pierce County Fire District 23
- South Pierce Fire and Rescue
- Bethel School District
- Carbonado School District
- Dieringer School District
- Fife School District
- Orting School District
- Peninsula School District
- Steilacoom School District
- Tacoma School District
- American Red Cross
- Crystal Village HOA
- Metropolitan Park District
- Port of Tacoma
- Riviera Community Club
- Clear Lake Water District
- Fruitland Mutual Water Company
- Lakeview Light and Power
- Mt. View-Edgewood Water Company
- Peninsula Light Company
- Summit Water and Supply Company
- Valley Water District
- Community Health Care
- Franciscan Health System
- Madigan Hospital
- Western State Hospital

The HMF will meet annually in the fall and will be coordinated by PC DEM. The Puyallup Tribe of Indians will be an active participant in the PC-HMF, and will be represented by the Public Safety Director, Land Use Director, and/or a Tribal Administrator. Only through this level of cooperation can these jurisdictions meet all of their mitigation goals.

Plan Evaluation and Update

It should be noted this planning process began in late fall of 2015 following the then current 44 CFR 201.7 Hazard Mitigation Planning Requirements. Based on new requirements in the Stafford Act, the Puyallup Tribe of Indians will evaluate and update the plan to incorporate these new requirements as necessary. Furthermore, if there are additional Stafford Act changes affecting 44 CFR 201.7 in the coming years, the planning process will incorporate those as well.

The Puyallup Tribe Plan will guide the Tribe's mitigation efforts for the foreseeable future. The Tribe's representatives on the Planning Team have developed a method to ensure that regular

review and update of the Plan occur within a five-year cycle. Public Safety will coordinate any reviews through the November EMC meeting noted above.

The Public Safety Director, in collaboration with PC DEM and the PC HMF, will monitor and evaluate the mitigation strategy implementation. The Public Safety Director will track this implementation using both the Tribe's and Pierce County's GIS database and other mechanisms as appropriate. Findings will be presented and discussed at the annual meeting.

Public Safety will provide a report of the Plan's implementation to the EMC at the annual meeting. This report will drive the meeting agendas and will include the following:

- Updates on implementation throughout the reservation;
- Updates on the PC-HMF and mitigation activities undertaken by neighboring jurisdictions or like organizations;
- Changes or anticipated changes in hazard risk and vulnerability at the planning area, county, regional, State, FEMA X, and Homeland Security levels.
- Problems encountered or success stories;
- Any technical or scientific advances that may alter, make easier, or create measures.

The EMC and local experts will decide on updates to the strategy based on the above information and a discussion of:

- The various resources available through budgetary means as well as any relevant grants;
- The current and expected political environment and public opinion;
- Meeting the mitigation goals with regards to changing conditions.

The Public Safety Director will work with PC DEM to review the Risk Assessment Section to determine if the information should be updated or modified based on new information. This will be done during the regularly scheduled reviews of the regional partners Hazard Identification and Vulnerability Analyses and their Comprehensive Emergency Management Plan.

Additional reviews of this Plan will be required following disaster events and will not substitute for the annual meeting. **Within ninety days following a significant disaster or an emergency event impacting the Tribe**, Public Safety will provide an assessment that captures any "success stories" and/or "lessons learned." The assessment will detail direct and indirect damages to the Tribe and its critical facilities, and response and recovery costs, as part of the standard recovery procedures that use WAEMD Forms 129, 130, and 140. This process will help determine any new mitigation initiatives that should be incorporated into the Plan to avoid similar losses due to future hazard events. In this manner, recovery efforts and data will be used to analyze mitigation activities and spawn the development of new measures that better address any changed vulnerabilities or capabilities. Any updates to the Plan will be addressed at the annual November meeting.

As per 44 CFR 201, the Tribe must re-submit the Plan to the State and FEMA with any updates every five years. This process will be coordinated by the Public Safety Director through the Pierce County Hazard Mitigation Forum. In 2022 and every five years following, the Tribal Public Safety Director will submit the updated plan to WA EMD and FEMA.

Plan Maintenance Review for 2017

The EMC reviewed the maintenance strategy for implementation, monitoring and evaluation for the 2017 update and will continue for the next five years implementing the structure provided currently with no additional changes feeling that it works. The three-tiered method continues to provide the Tribe's citizens a highly localized approach to loss reduction while serving their needs through coordinated policies and programs. The Tribe works closely with PC DEM with Public Education Programs within Tribal Departments promoting preparedness at home and in the workplace. In addition, the Tribe participates in the Pierce County Neighborhood Emergency Teams Program (PC NET) for preparedness on a neighborhood level. First Aid courses coordinated through PC DEM are attended by essential staff and members of the PC NET Program to achieve a more disaster resistant community. The Tribe will continue to participate with the PC-HMF providing a broader and multi-jurisdictional and multi-organizational approach to mitigation. This provides an opportunity to strengthen and develop new relationships and continues with achieving a disaster resistant region through coordinated planning efforts, training and participation in exercises. The EMC will continue to meet monthly to ensure a consistent progress towards the mitigation actions are made with reports to the committee on their department's progress. An annual review of the mitigation actions will occur in October prior to the PC-HMF in November. Progress on the mitigation actions for short-term, long-term and planned for the future long-term will be described in an annual report to the Puyallup Tribal Council in December.

Monitoring Progress of Mitigation Actions

The EMC will meet on a monthly basis to ensure consistent progress on the implementation of mitigation actions. Representatives to the EMC will report on the progress made by their respective departments. Departments not represented on the EMC will be invited to meetings as needed to report on the progress in their departments. The implementation of all short-term mitigation actions will be monitored by the EMC on an ongoing basis until implementation is complete. Long-term actions being actively implemented will be monitored on an ongoing basis, or at least annually as needed. Long-term actions planned for the future will be reviewed during plan updates every five years.

The system for reviewing progress on achieving goals, objectives, and specific actions included in the mitigation strategy will be based on a checklist of all objectives and actions. This checklist will be reviewed annually by the EMC. As described in the previous section, progress on mitigation actions will be described in an annual report to the Puyallup Tribal Council and in the five-year update of the Plan.

The Planning Team discussed the reviewing progress approach with the 2017 update and felt it was still a relevant method to track progress and changes with the mitigation actions. This system will remain with this plan and the checklist and comments annually will provide additional information into the summary paragraphs tracking the progress of each mitigation action.

Continued Public Involvement

The Tribe is dedicated to continued public involvement and education in review and updates of the Plan. Tribal Administration and Tribal Council will retain copies of the Plan and will post it on the Puyallup Tribe website¹. Public Safety will post any proposed changes to the Plan on the Tribe's Website.

The three-tiered implementation method provides an opportunity for continuous public involvement. Public Education campaigns are a means of informing the public on updates and implementation activities. Further, prior to submitting the Plan to WA EMD and FEMA for the five year review, the Tribal Administration will hold public information and comment meetings. These meeting will provide the public a forum for which it can express its concerns, opinions, or ideas about the Puyallup Tribe Mitigation Plan. This meeting will be advertised to the Tribe through a variety of media, including Tribal News (newspaper), fliers, and a posting on the website.

Endnotes

¹ Puyallup Tribe of Indians website: <http://www.puyallup-tribe.com/>