

Chapter 7 Planning Process

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7.1 Process

7.1.1 Overview

In January 2022, the Oregon Department of Land Conservation and Development (DLCD) applied through the Oregon Department of Emergency Management (OEM) for Fiscal Year 2021 Building Resilient Infrastructure and Communities (BRIC) grant from FEMA to update the Oregon Natural Hazards Mitigation Plan (OR NHMP). FEMA awarded the grant in February 2024. FEMA did not allow DLCD to use the two pre-award years to prepare to begin the update process immediately upon award. Therefore, only about one year was available update the NHMP while leaving sufficient time for OEM review, FEMA review, state adoption, and FEMA approval.

DLCD started by developing objectives for the updated plan, organizing, establishing project management protocols, identifying and assigning tasks and deliverables, and coordinating to ensure OEM’s oversight and communication with FEMA throughout the process to avoid any missteps that would cost time toward the end of the process and during the review and approval period.

DLCD also applied for funding from the Hazard Mitigation Grant Program (HMGP) to upgrade Oregon’s natural hazards risk assessment. FEMA awarded that grant in mid-November 2022. Timeline

Late Winter – Late Spring 2024	Organize the planning and public engagement processes; establish project management protocols; coordinate with OEM for oversight and communication with FEMA; and establish and assign tasks and deliverables to planning partners.
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Summer 2024	Evaluate the 2020 Oregon NHMP. Plan for fall public meetings to update various parts of the Oregon NHMP: <ul style="list-style-type: none"> • Review and Revise Mitigation Goals • Develop Criteria for Prioritizing Communities to Receive Grant Funding • Review and Revise Mitigation Actions • Prioritize Mitigation Actions
Fall 2024	Hold public meetings to update various parts of the Oregon NHMP.
Winter 2025	Revisit mitigation actions. Prioritize mitigation actions. Complete updating plan.
Early Spring 2025	Submit Draft Plan to OEM and FEMA for review and approval.
Early Spring – Mid-Summer 2025	Receive FEMA approval pending adoption. Adopt 2025 Oregon NHMP. Receive FEMA final approval.

7.1.2 Evaluating the 2020 Oregon NHMP

The State Interagency Hazards Mitigation Team (IHMT) oversaw development of the 2020 Oregon NHMP and therefore evaluated its performance. DLCD staff worked with State IHMT members to determine the status of each mitigation action in the 2020 Oregon NHMP, noting whether each action was (a) not started, (b) progressing, (c) completed, or (d) not being pursued. The results:

- 13% Not Started
- 76% Progressing
- 4% Completed
- 7% Not Being Pursued

DLCD also surveyed the State IHMT members to determine: (a) to *what degree* the members’ work achieved each goal and (b) *how effective* the members’ work was toward achieving each goal. DLCD distributed materials to for State IHMT members to reference when answering the survey: (a) the mitigation goals, (b) mitigation actions, (c) a table showing which actions were associated with each goal, (d) the criteria for evaluation listed in the 2020 Oregon NHMP, and (e) the “Opportunities for Improvement” in the 2020 Oregon NHMP Review Tool. On a 1-5 scale (1=Poor, 2=Needs Improvement, 3=Moderate, 4=Good, 5=Excellent), overall results were primarily 3-Moderate and 4-Good for both questions.

Next DLCD held a meeting with State IHMT members to discuss the results of the survey, how to apply them in this update, and the next steps for the plan update process. The discussion was high level with few specific suggestions.

The Oregon Water Resources Department (OWRD) houses the state’s Dam Safety Program. Dam Safety staff are members of the State IHMT. Dam Safety staff assisted in evaluating the 2020 Oregon NHMP.

7.1.3 Plan Update Meetings

The Risk Assessment Upgrade project held a meeting on October 1 as planned, but full results were not yet available. The group discussed the risk assessment method, reviewed preliminary results, and gave feedback. This was a setback for the NHMP update process, but given the compressed planning timeline, the process continued with plan update meetings.

At the next meeting, participants reviewed and revised the mitigation goals. Participants connected the mitigation goals to the preliminary risk assessment results and the mitigation actions to the mitigation goals. Participants discussed the requirements from the State Mitigation Planning Policy Guide effective April 19, 2023 (State Guidance), definitions of goals, and how to make goals SMART (specific, measurable, achievable, relevant, and time-Bound). The group revised goals, clarified goals, and incorporated the previous stand-alone High Hazard Potential Dams goal into two other goals resulting in 16 mitigation goals for the 2025 Oregon NHMP. The group also re-ordered the goals.

For the next two meetings, participants developed criteria for prioritizing jurisdictions to receive planning and project grants. The group reviewed FEMA's required and suggested criteria, and others suggested by DLCDC and OEM. The group made recommendations which DLCDC used to develop the final list of criteria.

Next, participants reviewed the list of mitigation actions that were "not started" or "in progress," to winnow it down to a shorter list of actions using the following criteria:

- Will contribute to achieving the mitigation goals.
- Will reduce vulnerability of people and property to natural hazard events.
- Targets specific vulnerabilities in one or more of the most vulnerable areas as shown by the risk assessment.
- Is cost-effective, environmentally sound, and technically feasible.
- Is achievable within five years.
- Is measurable and trackable.
- Is specific.
- Is likely to be equitable.

The participants answered questions to assess each mitigation action against each objective. The work spanned three meetings, and did shorten the list of mitigation actions, but not by a lot.

At the last meeting in early January, the participants revisited and refined the criteria for prioritizing jurisdictions to receive mitigation grants. Later, DLCDC reviewed the criteria against those in the new Administrative Plan to avoid inconsistencies or conflicts.

When final risk assessment results became available in January, participants used an online document-sharing platform to review, comment on, and edit the goals and mitigation actions using the risk assessment results, the state capability assessment, and the same set of questions. DLCDC finalized the mitigation actions using the participants' comments then posted the final list on the document-sharing platform. Participants prioritized the mitigation actions using a dot exercise modified for the virtual space.

During this process, many State IHMT members and other state agency subject matter experts became more engaged and shared their expertise. DLCDC integrated information about plans and programs in these

other agencies into the NHMP including climate change, health, climate adaptation, environmental justice, energy security, public utilities, state buildings, lifelines, resilience hubs, preparedness, and response.

Oregon's Dam Safety staff participated in the meetings, discussing mitigation goals and actions, prioritizing mitigation actions, and developing criteria for prioritizing jurisdictions to receive grants. The Dam Safety Program staff developed the Dam Safety portion of Chapter 3, Risk Assessment. Dam Safety Program staff also integrated their expertise, data, studies, and information into the OR NHMP.

7.2 Participants and Public Engagement

In April 2024, DLCD set up a [project website for the Oregon NHMP Update](#). OEM added a section about the Oregon NHMP Update to its [Hazard Mitigation Planning web page](#) and linked to DLCD's project web page. The DLCD project web page explains the update and links to the web page for the Risk Assessment Upgrade project. DLCD provided a comment form on the web page to encourage public comment at any time during the project. DLCD posted dates, times, registration links, agendas, and meeting materials for each meeting. After the meetings, DLCD posted presentations, notes, and recordings.

DLCD made all the project meetings virtual. In-person attendance had always been more difficult for people outside the immediate meeting area. While some tasks are harder virtually, virtual meetings increase attendance.

DLCD invited the nine federally recognized Tribes in Oregon to participate in the Oregon NHMP Update. DLCD's and OEM's Tribal Liaisons supported this effort. Further, throughout the project, DLCD submitted project updates to the State-Tribal Natural Resources Working Group. Tribes chose to participate at varying levels.

Prior to the first public meeting, DLCD invited many potential participants including:

- Everyone involved in the Risk Assessment Upgrade (about 350 people)
- Nine federally recognized tribes in Oregon
- Emergency managers and mitigation planners for Washington and Idaho
- State IHMT members
- Other state agency subject matter experts
- State Climate Change Adaptation Framework Implementation Team members
- Oregon Resilience Officer
- Oregon Climate Change Research Institute director
- Oregon State Climatologist
- Oregon State Archaeologist
- US Army Corps of Engineers staff
- US Geological Survey
- Emergency managers statewide
- Oregon State University professors
- Portland State University professors and staff
- University of Oregon Partnership for Disaster Resilience staff
- METRO staff
- Local government staff
- Council of government staff
- City and county lobbyists
- Individual activists
- Interested property owners
- Representatives of socially vulnerable populations and equity consultants
- Consultants in hazards and related sciences
- Consultants in economics

The State IHMT includes representatives from the following state agencies and universities:

- [Governor's Office - State Resilience Officer](#)
- [University of Oregon, Institute for Policy Research and Engagement \(IPRE\), Oregon Partnership for Disaster Resilience \(OPDR\)](#)
- [Department of Administrative Services \(DAS\)](#)
- [Oregon Department of Agriculture \(ODA\)](#)
- [Oregon Department of Consumer and Business Services-Building Codes Division \(DCBS-BCD\)](#)
- [Oregon Department of Consumer and Business Services-Division of Financial Regulation \(DCBS-DFR\)](#)
- [Business Oregon - Infrastructure Finance Authority](#)
- [Oregon Climate Change Research Institute \(OCCRI\)](#)
- [Oregon Climate Service \(OCS\)](#)
- [Oregon Department of Energy \(ODOE\)](#)
- [Department of Environmental Quality \(DEQ\)](#)
- [Oregon Department of Fish and Wildlife \(ODFW\)](#)
- [Oregon Department of Forestry \(ODF\)](#)
- [Department of Geology and Mineral Industries \(DOGAMI\)](#)
- [Oregon Health Authority \(OHA\) State Public Health Division](#)
- [Department of Land Conservation and Development \(DLCD\)](#)
- [Department of State Lands \(DSL\)](#)
- [Oregon Department of Emergency Management \(OEM\)](#)
- [Oregon State Fire Marshal \(OSFM\)](#)
- [Oregon Public Utility Commission \(PUC\)](#)
- [Oregon Department of Transportation \(ODOT\)](#)
- [Oregon Water Resources Department \(OWRD\)](#)
- [Oregon Parks and Recreation Department \(OPRD\)](#)
- [Oregon Watershed Enhancement Board \(OWEB\)](#)

DLCD also used GovDelivery to advertise the Fall 2024 meetings to approximately 2,000 people who had signed up for email updates. The meetings were well attended.

DLCD reached out even more broadly for public review of draft sections of the 2025 Oregon NHMP in February and March. The first set focused on the risk assessment and the second set on the other chapters. DLCD held two public webinars on the risk assessment, and two more on the whole plan. An online comment form included specific and open-ended questions. DLCD and OEM emailed notices or posted to:

- The lists of participants above
- DLCD's and OEM's GovDelivery lists
- DLCD's and OEM's social media accounts
- Oregon Planners Network email list
- OEM's Readiness Report
- DLCD's Oregon NHMP Update project web page
- DLCD's Risk Assessment Upgrade project web page
- OEM's Hazard Mitigation Planning web page
- Emergency management staff for the State of California
- Emergency management staff for the State of Nevada

The two public comment periods lasted two weeks each. DLCD continued to accept comments on the first release through the end of the second comment period. DLCD revised the draft NHMP in response to the comments as warranted and possible given the project timeline and budget. Comments and responses are in Chapter 9 – Appendix.

7.3 Revisions

This update substantially reduced the length of the plan from almost 1,800 pages in 2020. The updated plan eliminates separate risk assessments for each region which accounted for 1,000 pages. Also, regional profiles were consolidated into a statewide profile (Chapter 2, Oregon Profile).

DLCD updated the status of both “Priority” and “Ongoing” mitigation actions from the 2020 Oregon NHMP, but focused on reviewing, revising, and re-prioritizing only the “Priority” mitigation actions, renamed to “Five-Year” actions.

The most important revision is the new risk assessment method. It is more sophisticated and scientifically sound. In addition to assessing physical risk, it uses indicators of vulnerability and resilience. The results are relative, showing areas most at risk from hazards and areas most at risk from hazards given their vulnerability indicators. The state did not use this method for windstorms and winter storms due to lack of data. The state did not use this method for dam failure, due to its different engineering risk assessment methods.

7.4 Monitoring, Evaluating, and Updating

7.4.1 Monitoring

OEM is responsible for monitoring, evaluating, and updating the Oregon NHMP. The State Hazard Mitigation Officer (SHMO) will establish an expectation for State IHMT members to participate in plan monitoring and evaluation discussion and activities during its quarterly meetings. The mitigation goals and other evaluation criteria will guide the process.

One element of monitoring will be to check the status of each of the mitigation actions and determine if changes are necessary. The State IHMT Secretary will document any revisions, noting the reason(s) for revision. Other elements will include noting any capability enhancements or losses; noting any hazard events that have occurred during the quarter whether state or federally declared; need or opportunity for new mitigation actions; state-sponsored outreach and training that has occurred; documenting any mitigation successes; documenting full and effective use of mitigation funding; and documenting coordination and collaboration among state agencies and partners that has advanced state mitigation actions or goals.

Another element of the State of Oregon’s system for reviewing progress on achieving our goals will be via an examination using the following criteria:

- Has the state made considerable, moderate, or little progress toward achieving this goal?
- What are the implementation challenges and how might the state better address them?
- What new actions does the state need to better implement this goal?

- To what level of involvement have the State IHMT member and partner agencies engaged?
- Connections to the risk assessment, availability of new data, and how to reflect new data in the plan.
- How can we make this goal more “SMART,” i.e., specific, measurable, achievable, relevant, and time-bound?

Further, at a regular quarterly meeting following a declared disaster event in Oregon, the State IHMT will conduct an after-action review of the event in relationship to the Oregon NHMP and provide any necessary direction for updating the Plan. OEM will document this discussion as usual in State IHMT meeting minutes and following the meeting OEM will make necessary updates to the mitigation strategy for FEMA Joint Fields Offices or state mitigation actions.

The State Hazard Mitigation Officer (SHMO) coordinates the mitigation grant review process by systematically monitoring the implementation of state and local subgrantee mitigation actions. Successful implementation requires open communication between the grantee (OEM) and subgrantee to ensure schedules, budgets, and deliverable requirements are met.

The SHMO or designees are responsible for reporting this information to the State IHMT for projects funded by the Hazard Mitigation Grant Program, Pre-Disaster Mitigation (legacy projects), Building Resilient Infrastructure and Communities grants, and Flood Mitigation Assistance programs.

Outside of the traditional FEMA mitigation grant programs, state and local governments identify and often implement mitigation actions and projects using their own capabilities and resources. At the local level, this may include the development and adoption of local ordinances and regulations that have a hazard mitigation component; mitigation codes and standards as part of ongoing transportation and public works programs; hazard-related components of local comprehensive land use plans; and so forth.

While it may not be possible to track and report on every mitigation accomplishment in local mitigation plans, communities will see the positive cumulative impacts of these efforts in reduced disaster losses. The state encourages the seamless integration of mitigation activities into the planning efforts and day-to-day operations of state and local government programs.

7.4.2 Evaluating

OEM will also manage and facilitate the plan evaluation process. The Oregon NHMP’s goals will serve as the benchmarks for evaluation, and the following more specific criteria will be assessed as well:

- Progress toward completion of mitigation actions
- Progress toward refining the mitigation actions to more clearly address the greatest hazards and vulnerabilities statewide and establish the foundation for eligibility for project funding
- Progress in coordinating state and tribal-local mitigation planning
- Progress in seamless coordination of funding and the timing of multi-hazard risk assessments produced via RiskMAP, form a foundation for new local NHMPs and NHMP updates
- Progress in building local government capacity to:
 - Develop and update NHMPs and CWPPs
 - Integrate them with each other and with comprehensive or strategic and other plans
 - Implement those plans
 - Track changes in development

- Develop project applications
- Progress in mitigating flood hazards, particularly for repetitive and severe repetitive loss properties
- Progress in assessing risk of high hazard potential dams and mitigating potential loss of life, property, and state and local critical/essential facilities
- Progress in diversifying funding sources
- Progress in building state capacity to a level that:
 - Allows the state to regain and easily retain enhanced plan status
 - Supports a comprehensive statewide natural hazards mitigation program
 - Supports integration of natural hazards mitigation into other state programs and initiatives
 - Supports the state in coordinating state with local mitigation planning
 - Provides funding to state agencies to participate in the State IHMT and Oregon NHMP monitoring, evaluation, and update activities and to participate in coordination, cooperation, collaboration and integration activities with related state programs and initiatives.

The Oregon Department of Land Conservation and Development will assist OEM by evaluating:

- Accuracy and utility of the State Risk Assessment in the context of any Presidentially declared major disasters or Governor-declared States of Emergency that may have occurred during the update cycle;
- Progress in applying the lessons learned from the risk assessment methodology to enhance it further;
- Progress in developing data for currently data-poor hazards;
- Continued progress in developing data statewide for the data-richer hazards;
- Progress in developing vulnerability data and making choices about the most important vulnerability indicators.

Results of the evaluation will be documented and serve as the basis for updating the Oregon NHMP.

7.4.3 Updating

OEM is responsible for updating the Oregon NHMP every five years. The update process will begin three years before the plan expires. State IHMT members will assist in the update according to their expertise and roles in natural hazards mitigation. Subject matter experts and skilled technical professionals will lead on elements of the plan, such as vulnerabilities and GIS analyses, and provide other resources as required. Work will be done outside of the quarterly State IHMT meetings.

7.5 Assurances

The State of Oregon will comply with all applicable federal statutes and regulations in effect with respect to the periods for which Oregon receives grant funding, including [2 CFR parts 200](#) and [3002](#).

The State of Oregon will amend the Oregon Natural Hazard Mitigation Plan whenever necessary to reflect changes in state or federal statutes and regulations.