



APPENDIX J LINKAGE PROCEDURES

This appendix contains the linkage procedures for the Erie County Hazard Mitigation Plan (HMP).

J.1 ADMINISTRATIVE PROCESS FOR “LINKAGE” TO THE ERIE COUNTY HAZARD MITIGATION PLAN

Despite the county’s efforts to ensure that every eligible jurisdiction in the county fully participated in the planning process, not all of the jurisdictions did. Completed jurisdictional annexes are presented in Section 9 (Jurisdictional Annexes). Any non-participating local governments within Erie County can join this plan as a participating jurisdiction and ultimately achieve approved status by following the linkage procedures defined in this appendix.

It is assumed that some or all of these non-participating local governments may choose to "link" to the plan at some point in time to gain eligibility for programs under the Disaster Mitigation Act of 2000 (DMA 2000). In addition, some of the current partnerships 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 Erie County HMP Planning Partnership and all planning partners for dealing with the increase or decrease in planning partners linked to this plan. It should be noted that currently non-participating jurisdictions within the defined planning area are 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.

J.1.1 Increasing the Partnership Through Linkage

Eligibility

Eligible jurisdictions located in the planning area can link to this plan at any point during the plan’s performance period (5 years after final approval). Eligibility will be determined by the following factors:

- The linking jurisdiction is a local government as defined by the Disaster Mitigation Act.
- The boundaries or service area of the linking jurisdiction is completely contained within the boundaries of the planning area established during the 2021 HMP development process.
- The linking jurisdiction’s critical facilities were included in the critical facility and infrastructure risk assessment completed during the 2021 HMP development process.

Requirements

It is expected that linking jurisdictions will complete the requirements outlined below and submit their completed template to Erie County Office of Emergency Services (the lead agency) for review within six months of beginning the linkage process:

1. The Erie County Hazard HMP Planning Partnership has established an annual window for which linkage to the plan can occur. Linking jurisdictions are instructed to complete the following procedures during this time frame.



2. The current non-participating jurisdiction contacts the Erie County Hazard Mitigation Planning Coordinator for the plan and requests a "Linkage Package". The Erie County HMP Coordinator is:

Greg Butcher, Deputy Commissioner
Erie County Department of Homeland Security and Emergency Services
45 Elm Street
Buffalo, NY 14203
716-858-6578
Email: Gregory.Butcher@erie.gov

3. The Erie County HMP Coordinator will provide a linkage package that includes:
 - Copy of Volume 1 and 2 of the HMP (CD-ROM or other electronic medium)
 - Planning Partner's Expectations Sheet
 - Sample Letter of Intent to link to the plan
 - Jurisdictional template and instructions
 - Catalog of Hazard Mitigation Alternatives or the Mitigation Catalog
 - Copy of Section 201.6 of Chapter 44, the Code of Federal Regulations (44CFR), which defines the federal requirements for a local HMP
4. The new jurisdiction will be required to review both volumes of the plan, which includes the following key components for the planning area:
 - The Erie County risk assessment
 - The plan's goals and objectives
 - Plan implementation and maintenance procedures
 - Catalog of potential mitigation actions
 - County-wide initiatives

Once this review is complete, the jurisdiction will complete its specific jurisdictional annex by following the template and its instructions for completion provided by the Erie County HMP Coordinator. Technical assistance can be provided upon request by completing the request for technical assistance (TA) form provided in the linkage package. This TA can be provided by the Erie County HMP Coordinator or any other resource within the Planning Partnership, such as a member of the HMP Planning Partnership or a currently participating jurisdiction. The Erie County HMP Coordinator 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 attempt to solicit public opinion on hazard mitigation at the onset of this linkage process and conduct 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 jurisdiction's 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 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 Erie County HMP Coordinator for a pre-adoption review to ensure conformance with the regional plan format.
7. The Erie County HMP Coordinator will review for the following:
 - Documentation of public involvement and mitigation action development strategies
 - Conformance of template entries with guidelines outlined in instructions
 - Chosen actions are consistent with goals, objectives, and mitigation catalog of Erie County HMP
 - Designated point of contact

The Erie County HMP Coordinator may utilize members of the HMP Planning Partnership or other resources to complete this review. All proposed linked annexes will be submitted to the HMP Planning Committee for their review and comment prior to submittal to the New York State Division of Homeland Security and Emergency Services (NYS DHSES).

8. Plans approved and accepted by the HMP Planning Partnership will then be forwarded to NYS DHSES for review with a cover letter stating the forwarded plan meets local approved plan standards and whether the plan is submitted with local adoption or for other review.
9. NYS DHSES will review plans for state and federal compliance. Non-compliant plans are returned to the jurisdiction for correction. Compliant plans are forwarded to Federal Emergency Management Agency (FEMA) Region II office for review with annotation as to the adoption status.
10. FEMA Region II reviews the new jurisdiction's plan in association with the approved plan to ensure DMA compliance. Region II notifies the new jurisdiction of results of the review with copies to NYS DHSES and approved planning authority.
11. The new jurisdiction corrects the plan's shortfalls (if necessary) and resubmits to NYS DHSES through the approved plan lead agency.
12. For plans with no shortfalls that have not been adopted from the Region II review or outstanding corrected shortfalls, the new jurisdiction governing authority adopts the plan (if not already accomplished) and forwards adoption resolution to Region II with copies to the lead agency and NYS DHSES.
13. Region II Director notifies the new jurisdiction governing authority of plan approval.

The new jurisdiction's plan is then included with Erie County HMP, and the linking jurisdiction is committed to participate in the ongoing plan implementation and maintenance identified in Volume 1 of the HMP.