



Comments on Draft National Disaster Recovery Framework
American Planning Association
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Overall, the draft National Disaster Recovery Framework represents a major step forward in taking seriously the Federal role in facilitating long-term community recovery after major disasters. The difficulties of fostering recovery after the catastrophic disaster of Hurricanes Katrina and Rita in 2005 made clear the need to clarify thinking at all levels of government about the principles, logic, and structure of recovery functions in order to achieve results that increase the resilience of American communities in the future. It is certainly not enough to begin thinking about recovery only after the disaster has occurred. The potential for most disasters stemming from natural hazards is clear enough that almost all communities facing such prospects could begin now to take steps to prepare themselves for events whose ultimate occurrence is only a matter of time. Very seldom should a disaster be truly unexpected. For that reason, planning for both mitigation of those hazards and recovery from disasters should begin before those events occur.

Moreover, the success of the federal government in inducing more than 19,000 jurisdictions nationwide to submit local hazard mitigation plans for approval under the Disaster Mitigation Act serves to demonstrate that, with the right incentives in place, communities will respond with appropriate planning efforts. We need to strengthen those efforts over time and bring post-disaster recovery within the orbit of those efforts through properly structured incentives and programs.

APA encourages one essential point that is repeated throughout the draft framework: the principle of support for pre-event planning for post-disaster recovery. APA first espoused this concept, well ahead of all but a few communities nationwide, in its FEMA-funded Planning Advisory Service Report, *Planning for Post-Disaster Recovery and Reconstruction*, published in December 1998. Thousands of copies of this document have circulated since then, many of them circulated throughout the Gulf Coast after Hurricanes Katrina and Rita by both APA and FEMA, and many

practitioners have cited the document as a crucial source of ideas for guiding recovery in the years since its release. However, over the last 12 years much has changed, and even this document is now in serious need of major updates to remain current, especially in view of the National Disaster Recovery Framework initiative itself. 2

APA is pleased to see this principle reinforced throughout the document in a number of places:

- On page 12, under the heading of “Preparation of Recovery,” where the ability of such pre-event planning to bolster resilience is clearly stated;
- On page 22, where the need for a state role in supporting such planning is stated;
- On page 25, where it is also acknowledged as a federal responsibility; and
- On page 30, where the need for a metric for leveraging pre-disaster preparation is noted in the context of ensuring its integration with hazard mitigation.

Taking each point in turn, we want to enhance those points with the following observations:

- In the PAS Report cited above, APA long ago provided a model recovery ordinance for use by communities to establish the guidelines for managing the process of long-term recovery so that communities would not be establishing that framework in the midst of crisis. That model remains available and usable as at least a very solid starting point in providing a governing structure for the recovery process.
- Florida has provided a model for creating plans for structuring recovery through its requirement in coastal jurisdictions for a post-disaster redevelopment plan. APA most recently highlighted this program in an article in the October 2009 issue of *Planning* magazine. NOAA has supported the state’s effort by underwriting a pilot project to develop such plans in six jurisdictions, which have all completed their plans in recent months.
- Such state support is critical, though rare, but could become more widespread through the proper incentives, just as federal incentives have brought about widespread compliance with the

Disaster Mitigation Act of 2000 (DMA). Tying some recovery funding to the pre-event preparation of such a plan would certainly provide an incentive parallel in some ways to those of DMA. While creating such incentives would probably require legislation beyond the scope of the National Disaster Recovery Framework, acknowledging this parallel principle with the framework may at least plant the seeds for such legislation. We assume that some such idea was at work in the reference on page 30 to metrics that “leverage pre-disaster preparation” to ensure integration of such planning with hazard mitigation.

- Federal responsibility appears as a somewhat more robust concept in this framework than in any previous document. Certainly, federal involvement should go well beyond what is envisioned in the current ESF-14 program within the National Response Framework. That program operates within a larger framework that is oriented primarily to response and not to long-term recovery and is somewhat hobbled operationally by that very fact. A federal involvement in fostering recovery that breeds local resilience needs a better systematic understanding of local planning processes than has typically been the case to date. It certainly would not hurt to have a process with substantial staffing by professional planners conversant with local planning procedures and challenges. ESF-14, while well intentioned, has fallen short in this respect and has not embraced the full range of planning possibilities, often ending up with something more akin to project lists than true plans. The draft framework implicitly acknowledges this reality in its strong and repeated support for pre-disaster planning for recovery, for integrating hazard mitigation with recovery, and in other ways. It may be important now to see ESF-14 as an important transitional phase in national thinking, a device that pushed us all in the right direction but now must be superseded by a considerably more robust and fully considered approach to the problem of fostering much greater resilience in the process of redevelopment after disasters.
- Finally, if hazard mitigation is to be effectively integrated into the process of long-term recovery, it is important that federal and state support facilitate, rather than impede, the seizure of strategic opportunities to implement hazard mitigation projects

when they really matter. For this purpose, it will be critical in the future for federal Hazard Mitigation Grant Program funds, and any other funds supporting mitigation efforts, be available in a timely fashion.

We conclude these comments by taking note of the framework's organizational structure of six Recovery Support Functions, an obvious parallel to the current 15 support functions under the National Response Framework. While all of these—Community Planning & Capacity Building; Economic Development; Health, Social & Community Services; Housing; Infrastructure Systems; and, Natural & Cultural Resources—are important to planners in varying degrees, the issue of proposed coordinating agencies, primary agencies, and supporting agencies becomes important in each case because some entity needs to be in charge.

Community Planning & Capacity Building may well be the most important, however, because it appears to be somewhat up for grabs between HUD and DHS/FEMA, while the others have clearly indicated leadership. There is some ambivalence at the moment on this point among planners with significant disaster-related planning experience. While HUD is perceived as having a better understanding of planning, recovery planners have said it is more likely to bestow money without close oversight and engagement. At the same time, DHS/FEMA's ESF-14 staff has been lacking in professionally trained planners and had only short-term engagement as a rule. As a result of these deficiencies, any agency assuming this function needs to demonstrate two commitments:

- to planning through its own staffing of this function, so that leadership at the federal level has a trained understanding of planning functions at the state and local levels
- to ground-level engagement at the local and regional level throughout the recovery process.

Ground-level engagement increases the likelihood that the agency will maintain contact with the reality of the progress being made. This will increase the probability of success. If either of those two commitments is missing in the agency responsible for managing the Community Planning & Capacity Building support function, the likely result will be a



failure to realize the potential embodied in this draft framework. In the end, the agency in charge must still acquire operational muscle through the resources assigned to the job and the manner of its implementation. ⁵

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Sincerely,