Debris Management Plan Review Job Aid

This job aid outlines the process the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) will use to review Debris Management Plans (Plan) submitted for consideration under the Public Assistance (PA) Alternative Procedures Pilot Program for Debris Removal (Debris Pilot). The Sandy Recovery Improvement Act of 2013 (SRIA) (P.L. 113-2) authorized FEMA to provide an incentive to State, Tribal, or local governments, or owners or operators of a private nonprofit facility to have a Plan in place and accepted by FEMA prior to the declaration of a major disaster or emergency declaration. A Plan is a written document establishing procedures and guidance for managing disaster debris in an expeditious, efficient and environmentally sound manner. Grantees and Subgrantees may refer to the *Public Assistance Debris Management Guide* (FEMA 325) for more extensive details regarding items to consider in development of a Plan.

A. Cost Share Incentive

When a Grantee or Subgrantee has a Plan determined acceptable by FEMA and has identified at least one or more pre-qualified contractors before the date of the disaster declaration incident period, FEMA will provide a one-time incentive of a two (2) percent increased cost share adjustment for the first 90 days of debris removal activities, beginning the first day of the declared incident period, provided the Plan is implemented for that disaster.

B. Basic Plan Elements

The content of each Plan will vary depending on State, Tribal and local ordinances, zoning, locations of area-critical infrastructure, emergency services, disposal locations, and other localized factors. However, the following 12 elements are the basic components of a comprehensive Plan:

1. **Debris Management Plan Overview.** This section of the Plan should include a discussion explaining the Plan's purpose and its overarching goals. It should also include a brief discussion about how the Plan was developed; who participated in the Plan development (effort should be made to include all internal departments and external entities that may be involved with the debris removal operations); and, whether the Plan is officially adopted by the governing body.

2. **Events and Assumptions.** Forecasting the type and quantity of debris is essential to the debris removal planning process. The Plan should identify the types and severity of disasters that are most likely to occur along with the types and anticipated quantities of debris that may be generated. It should also identify the type of handling that would be necessary to safely manage the debris. The Plan should describe the general terrain types, land use, and accessibility for the areas which would most likely be impacted by the disaster and how these characteristics may affect debris operations.

3. **Debris Collection and Removal.** A debris collection strategy establishes a systematic approach for the efficient removal of debris so that the community can recover quickly after a disaster. The clearance and collection of disaster debris should be structured to meet response and recovery priorities. As such, the Plan should identify and prioritize facilities that will be impacted by disaster debris. It should also define the priorities during both the response and recovery phase operations and describe the coordination process with other entities responsible for managing debris. The Plan should identify roles and responsibilities for all functions involved (e.g., Public Works, Finance, Solid Waste Departments, etc.). Additionally, the Plan should address the methods that will be used to remove debris (i.e., curbside collection, community drop-off bins, etc.).

4. **Temporary Debris Management Sites and Disposal Locations.** The Plan should identify locations where the disaster debris will be segregated, reduced and disposed and/or whether it will be recycled. The Plan should address traffic circulation at each of the disposal sites, disposal capacity and how debris will be managed if there is a lack of landfill capacity.

5. **Debris Removal on Private Property.** Debris removal from private property is generally the responsibility of the individual property owners; however, when it is in the public interest to remove debris, the Grantee or Subgrantee may act to abate the threat. The Plan should identify the circumstances under which the Grantee or Subgrantee will take such action and identify the enabling laws that allow government to intercede in private property matters. The Plan should also provide discussion on the specific steps it will undertake to obtain permissions to enter on the private property and how it will recoup costs (such as insurance proceeds) for the debris removal.

6. **Use and Procurement of Contracted Services.** The Plan should discuss the circumstances when contracted services will be required and describe the types of debris operations that will be contracted. The Plan should describe the process and procedure for acquiring competitively procured contracted services. All contracts must comply with

Federal procurement requirements (i.e., completive bidding), as outlined in Title 44 Code of Federal Regulations (CFR) §13.36; Federal requirements may be more stringent than State or local requirements (See also Recovery Fact Sheet 9580.201 *Debris Contracting Guidance*).

7. **Use of Force Account Labor.** The Plan should clearly define the types of work that will be performed by force account labor.

8. **Monitoring of Debris Operations.** Debris monitoring helps ensure that the debris removal contractors are performing the agreed upon scope of work as per the contract and helps to maintain the required documentation for FEMA PA reimbursement. The Plan should include details as to how the Grantee or Subgrantee will monitor its debris removal contractor at pickup sites, Debris Management Sites/Temporary Debris Storage and Reduction Sites and final disposal areas. Specifically, the Plan should discuss who will perform the monitoring and describe each monitoring task.

9. **Health and Safety Requirements.** Debris operations involve the use of heavy equipment and numerous types of trucks, which can pose safety hazards to emergency workers and the public. In addition to safety hazards, exposure to certain types of debris can pose potential health risks to emergency workers and the public. The Plan should include specific details as to how workers and the public will be protected and discuss the specific measures for adherence to safety rules and procedures.

10. **Environmental Considerations and Other Regulatory Requirements.** The removal and disposal of certain types of debris can impact human health and the physical environment. Successful debris operations depend on compliance with Federal, State and local environmental laws. The Plan should identify all debris operations that may trigger compliance with environmental and historic preservation laws. It should also identify how compliance will be attained.

11. **Public Information.** The dissemination of debris removal information is critical to the effective and efficient removal of disaster debris. The Plan should include a public information strategy to ensure that residents receive accurate and timely information about the parameters, rules, and guidelines for debris removal.

12. **Identification of Debris Removal Contractors.** The Subgrantee must identify at least one or more debris contractors that it has pre-qualified to perform debris operations. A pre-qualified contractor is one that has been identified and evaluated by a local government and has been determined to be capable to perform debris removal work (e.g.,

capabilities, bonding, insurance, availability). Identification of these qualifications should be done in conjunction with drafting the debris management plan, which should include specific contract requirements and explain how contractor qualifications are established. The purpose of having a pre-qualified contractor is to have a list of qualified contractors to compete the work. A pre-qualified contractor does not constitute a stand-by contractor. Subgrantees must still comply with Federal procurement requirements (i.e., completive bidding), as outlined in 44 CFR §13.36.

C. Plan Submittal and FEMA Review

Subgrantees should submit their Plan to the Grantee for initial review and coordination. The Grantee should review the Plan to validate that it meets the overall intent of establishing processes and procedures to remove debris expeditiously, efficiently and in an environmentally sound manner and provide the Subgrantee with any necessary feedback on the content. Once the Grantee confirms that the Plan sufficiently addresses each of the elements in the *Debris Management Plan Checklist* (Plan Checklist) (attached), the Grantee should forward it to the FEMA Regional Administrator for review.

FEMA will use the Plan Checklist to ensure that the Plan addresses the 12 basic components of a comprehensive debris management plan:

- Debris management overview
- Events and assumptions
- Debris collection and removal plan
- Temporary Debris Management Sites and disposal locations
- Debris removal on private property
- Use and procurement of contracted services
- Use of force account labor
- Monitoring of debris operations
- Health and safety requirements
- Environmental considerations and other regulatory requirements
- Public information
- Identification of one or more prequalified debris removal contractors

If upon completion of review, FEMA determines that the Plan does not sufficiently address all of the Plan elements outlined above, then FEMA will provide written notification to the Grantee citing the Plan's deficiencies. The Subgrantee may revise the Plan and resubmit it through the Grantee to FEMA for review.

When a Plan is accepted, the FEMA Regional Administrator will send an acceptance letter to the Grantee (see attached template). FEMA should provide its determination of whether the Plan is acceptable no later than 30 days from the date of receipt of the Plan. Review and acceptance of a Plan does not mean that FEMA is approving any operational component of the plan, nor does it mean that the Federal government will fund any aspect of the Plan. Eligibility of costs for debris removal and management in a declared major disaster or emergency will be determined based on established PA Program authorities, regulations, policies and guidance.

The Grantee should retain a record of the Plan and ensure the Subgrantee receives a copy of the acceptance letter. After a major disaster or emergency declaration, the Subgrantee must notify the Grantee whether it would like to request the one-time two (2) percent Federal cost share increase for that incident.

FEMA will track the Subgrantees that submit a Plan for review and acceptance. This will include whether FEMA accepted the Plan and which Subgrantees have received the two (2) percent Federal cost share incentive. Each FEMA Regional Office will maintain the spreadsheet located in the corresponding folder for that region under the Debris Management Plan folder on the FEMA Headquarters SharePoint site.

Debris Management Plan Checklist

Applicant Name State/Territory/Tribe

Applicant Point of Contact Contact Number

Yes	No	Plan Requirements	Comment
		Overview – Does the plan describe the purpose and objectives?	
		Events and Assumptions- Does the plan provide information on the types and anticipated quantities of debris that will be generated from various types and sizes of events?	
		Debris Collection and Removal- Does the plan have a debris collection strategy? Does the plan discuss the methods that will be used to remove debris and establish priorities for clearance and removal? Does the plan outline the roles and responsibilities of the various functions involved (Public Works, Finance, and Solid Waste Departments, etc.)?	
		Debris Disposal Locations and Debris Management Sites- Does the plan identify where the disaster debris will be segregated, reduced, and disposed or whether debris will be hauled to a recycler?	
		Debris Removal on Private Property- Does the plan address the authority and processes for private property debris removal?	
		Use and Procurement of Contracted Services- Does the plan describe the types of debris operations that will be contracted? Does the plan describe the process and procedure for acquiring competitively procured contracted services?	
		Use of Force Account Labor- Does the plan define the types of work force account labor will accomplish?	

Yes	No	Plan Requirements	Comment
		Monitoring of Debris Operations- Does the plan describe who and how debris removal contractors will be monitored at pickup sites, Debris Management Sites/Temporary Debris Storage and Reduction Sites and final disposal?	
		Health and Safety Requirements- Does the plan describe how workers and the public will be protected and discuss the specific measures for adherence to safety rules and procedures?	
		Environmental Considerations and Other Regulatory Requirements- Does the plan identify all debris operations that will trigger compliance with environmental and historic preservation laws and how compliance will be attained?	
		Public Information- Does the plan include a public information strategy to ensure that residents receive accurate and timely information about debris operations?	
		Identification of Debris Removal Contractors- Does the jurisdiction identify at least one or more debris contractors that it has prequalified?	

Debris Management Plan Acceptance Letter Template

Addressed to the Grantee

Dear [Insert Name],

This letter responds to the [your, or Name the State Office of Emergency Services …] request dated [date of correspondence] for the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) to accept the [name of jurisdiction] Debris Management Plan (Plan) for participation in the Public Assistance (PA) Alternative Procedures Pilot Program for Debris Removal. This pilot program allows a one-time two (2) percent Federal cost share increase for debris removal operations performed within 90 days from the start of the incident period of a major disaster or emergency declaration.

FEMA Region [XX] has determined that the Plan:

- ☐ Contains the basic planning elements of a Debris Management Plan along with at least one prequalified debris and wreckage removal contractor (see enclosed Debris Management Plan Checklist). Therefore, FEMA has determined the Plan is acceptable. Accordingly, the [name of jurisdiction] may receive a one-time two (2) percent Federal cost share increase as part of the PA Alternative Procedures Pilot Program for Debris Removal. Your office should notify FEMA when [name of Jurisdiction] wishes to apply the incentive to its debris removal work.

- ☐ Does not contain the basic planning elements as noted in the enclosed Debris Management Plan Checklist. The [name of jurisdiction] may revise its Plan and resubmit it to FEMA, through your office, for reconsideration.

Acceptance of this Plan does not mean that FEMA is approving any operational component of the plan nor does it mean that the Federal government will fund work conducted under any aspect of the Plan. Eligibility of costs for debris removal and management in a declared major disaster or emergency will be determined based on established PA Program authorities, regulations, policies and guidance. Subgrantees must comply with Federal procurement requirements (i.e., competitive bidding), as outlined in 44 CFR §13.36 in the procurement of debris removal services.

Should [you, or the State Office of Emergency Services] have any questions you may contact [name of FEMA personnel] at xxx-xxx-xxxx.

Sincerely,

Signed
Regional Administrator or Designee
Enclosure