

Chapter 3. Planning Process

A1. Does the plan document the planning process, including how it was prepared and who was involved in the process? [44 CFR § 201.7(c)(1)]

a. Does the plan document how the plan was prepared, including the schedule or timeframe and the activities that made up the plan's development?

The hazard mitigation planning process followed the guidance and requirements provided by the Federal Emergency Management Agency (FEMA) with the following aim: “Reduce or eliminate risk to people and property from natural hazards.” Hazard Mitigation Plans form the foundation for a Tribe’s long-term strategy to reduce disaster losses and break the cycle of disaster damage, reconstruction, and repeated damage. The planning process is just as important as the plan itself. It creates a framework for risk-based decision-making to reduce damage to lives, property, and the economy. Developing the Hazard Mitigation Plan Update included a process of public outreach and stakeholder engagement.

Pala’s Hazard Mitigation Plan eases the burden of keeping the Reservation safe by identifying and communicating hazard risks, developing actions to reduce or eliminate those risks, and making the Tribe eligible for FEMA mitigation program funding. In addition, the mitigation planning process educated Reservation residents, Tribal employees and multiple stakeholders about disaster mitigation and climate adaptation.

3.1 Project Timeline

The original timeline with associated tasks is shown in the figure below. The project was completed on time; however, the majority of the work was condensed into the summer and fall of 2020. The Covid-19 pandemic led to a change in previously anticipated meetings. The consulting team did not travel to the Reservation, except in February 2020, because of Covid-19 travel restrictions. In addition, previously anticipated public meetings were not held, and emphasis was placed on the public preparedness survey and Zoom meetings.

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PROJECT TASKS	2019		2020											
	Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept.	Oct	Nov	Dec	
Task 1. Planning Process														
1.1 Project Initiation (Kickoff Meeting)														
1.2 Planning Committee Meetings (3)														
1.3 Conduct Public/Stakeholder Engagement														
1.4 Document and Summarize Planning Process														
Task 2. Hazard Analysis and Risk Assessment														
2.1 Data Collection and Analysis														
2.2 Hazard Identification														
2.3 Hazard Maps and Profiles														
2.4 Vulnerability Assessment														
2.5 Summarize Findings and Conclusions														
Task 3. Capability Assessment														
3.1 Review Existing Capabilities														
3.2 Summarize Findings and Conclusions														
Task 4. Mitigation Strategy														
4.1 Develop Mitigation Plan Goals and Actions														
4.2 Analyze Previous Mitigation Actions														
4.3 Develop and Prioritize Mitigation Action Plan														
Task 5. Plan Review, Evaluation, and Implementation														
5.1 Develop Plan Maintenance Procedures														
5.2 Develop Procedures for Continued Public Involvement														
5.3 Document Plan Update Changes														
Task 6. Plan Approval and Adoption														
6.1 Prepare Plan for FEMA Review														
6.2 Finalize Plan and Assist Tribe with Adoption														

Figure 13. Project Timeline.

The Tribe hired Jamie Caplan Consulting LLC (JCC) to work with the Pala Environmental Department and the Pala Environmental Department Advisory Group (PEDAG) to create the 2020 Pala Hazard Mitigation Plan. JCC wrote the Tribe’s original 2006 Hazard Mitigation Plan, and the 2009 and 2016 Hazard Mitigation Plan Updates.

3.2 Pala Environmental Department Advisory Group



Figure 14. Pala Tribal Chairman Robert Smith.

The PEDAG was developed by Shasta Gaughen, Pala Environmental Department Director, under the authority of Tribal Chairman Robert Smith (shown in the figure at left). The memorandum in the figure below, which is also included in Appendix A, indicates the formation of the PEDAG and their role in the development of the Hazard Mitigation Plan Update.

MEMORANDUM

DATE: FEBRUARY 6, 2020
TO: PALA ENVIRONMENTAL DEPARTMENT ADVISORY GROUP (PEDAG)
FROM: SHASTA GAUGHEN, DIRECTOR
CC: ROBERT SMITH, CHAIRMAN
RE: PEDAG PARTICIPATION

Chairman Smith is directing the departments/individuals listed below to participate in the Pala Environmental Department Advisory Group (PEDAG). Either you or your designee must take part. This group is necessary to advise the Pala Environmental Department (PED) on several grant-funded project activities, including updates to the Pala Hazard Mitigation Plan (HMP), draft environmental and utilities codes, Planet Pala, and other environment-related projects as necessary. PEDAG will meet once a month, starting on **Thursday, February 20**, which is when we are having our first HMP update meeting with our consultant. Please let me know if you have questions, and thank you for your help.

1. Steve Eagleton, Pala Utilities Director
2. Joe Nejo, Pala Tribal Services Director
3. Anthony Ravago, Pala Fire Chief
4. Doretta Musick, Pala Learning Center Director
5. Ann Trujillo, Pala Housing Director
6. Matthew Deveney, Pala GIS
7. Bob Halsted, Pala Casino
8. Eric Ortega, Pala community member
9. Chris Nejo, Pala community member

Figure 15. PEDAG Formation Memo.

The PEDAG met formally four times during the development of this plan. Each meeting's agenda and sign-in sheet are included in Appendix A. In addition, a Kick-off Meeting, was held with the Shasta Gaughen and Heidi Brow, Water Resource Specialist, Pala Environmental Department. Shasta and Heidi worked closely with the consulting team and led the project from the Tribal side.

The PEDAG met initially in February 2020 in the Pala Fire Department Training Center. This was an opportunity to review the planning process and to engage the key stakeholders on the Reservation. New buildings and infrastructure were identified as were high hazard areas. The Tribe provided a couple of large maps of the Reservation for the PEDAG to write-on to indicate critical facilities and high hazard areas. The Arizona Crossings were identified, and it was determined to include a question in the public

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preparedness survey about which crossings should be prioritized for repair or replacement. The picture above shows PEDAG members marking-up the Reservation maps.

The question of which hazard is more concerning wildfire or flood was raised. While wildfire incidents may be more frequent, they are less disruptive to the Tribe because they are expected and planned for. When floods occur Reservation residents and employees often do not know how to react. In addition, flooding tends to trap citizens, for instance in Sycamore or in the Village.

The PEDAG held Zoom meetings in July and August 2020. During the July 2020 meeting the list of critical facilities was refined and the hazard list was finalized. The previous plan's list of goal statements was reviewed, and it was decided to emphasize climate adaptation, education and outreach, and regional partnerships.

During the August 2020 meeting, the PEDAG made a list of regional stakeholders to include in reviewing the Hazard Mitigation Plan. The majority of the meeting focused on review and discussion of each proposed hazard mitigation action. Based on information gathered at the two previous meetings, the final list of mitigation actions was agreed on.

3.3 Public Engagement and Outreach

A2. Does the plan document an opportunity for public comment during the drafting stage and prior to plan approval, including a description of how the tribal government defined "public"? [44 CFR § 201.7(c)(1)(i)]

a. Does the plan describe how the tribal government defined "public?"

b. Does the plan describe how the public was given the opportunity to be involved in the planning process?

c. Does the plan describe how public feedback was incorporated into the plan?

The public outreach part of the planning process was multi-pronged. It included a public survey, meetings, print materials and social media and an opportunity for the public to review and comment on the draft Hazard Mitigation Plan. The PEDAG defined the public for purposes of this planning process as members of the Pala community, this included Tribal members, Reservation residents and employees and key stakeholders involved with the Tribe. Prior to the Covid-19 pandemic, the PEDAG intended to



Figure 16. PEDAG Members at February 2020 Meeting.

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host two public meetings, to host a meeting at the Senior Center, to set-up a booth at Cupa Days, and get on the agenda of a General Council meeting. Outreach to the public included the following:

Table 5. Public Outreach and Engagement.

Outreach	Description
Pala General Council Meetings	The Pala Tribe's voting base meets monthly to review Tribal business. Staff are not allowed to be present, so the Pala Environmental Department presented Hazard Mitigation Plan updates for Tribal Council to present during these meetings. These in-person meetings had to be curtailed due to COVID-19 concerns.
Indian Health Service Event	Pala Environmental Department staff provided brochures and information on various climate-change related impacts (e.g.: drought, extreme heat, flooding, wildfire), and how to develop a family emergency plan
Meetings regarding Pala's Physical Addresses	Pala's Fire Department and GIS Department are working to inform our community about the need to update the physical addressing system on the reservation; public meetings were held but had to be discontinued due to COVID-19 - they will be resumed late 2020/early 2021.
Door-to-Door Information Gathering	Pala Environmental Department staff went door-to-door in some Pala neighborhoods to conduct routine housing inspections. While speaking with residents, staff reviewed their environmental concerns & discussed impacts highlighted in Pala's Hazard Mitigation Plan efforts. This effort had to be curtailed due to COVID-19 concerns.
Weather Alerts	Pala Environmental Department staff routinely send out weather alerts on email and Facebook posts during large storms and extended heatwaves, to alert the community about potential flooding or extreme heat impacts to be aware of. Educational information was also provided with storm notices.
Print Outreach	<ul style="list-style-type: none"> • Planet Pala Climate Change Flyer Series • Family Emergency Planning • Environmental Health

Outreach	Description
	<ul style="list-style-type: none"> • Tribal Quarterly Newsletters
Social Media	<ul style="list-style-type: none"> • https://www.facebook.com/PalaEnvironmentalDepartment/ • https://www.instagram.com/planet_pala/ • http://ped.palatribe.com/

3.3.1 Public Preparedness Survey

The Pala Public Preparedness Survey included 13 questions and was available to the public from June-September 2020. A \$100 Amazon Gift Card was promoted as a raffle prize for everyone who completed the survey. The Tribe developed a flyer advertising the survey which is shown in Figure 17. It took approximately 8 minutes for someone to complete the survey. The PEDAG considered going door-to-door with the survey but realized due to the recent Covid-19 outbreak in the area this was not realistic. Unfortunately, despite outreach efforts participation in the survey was extremely low and only 35 surveys were collected.

Key results are included here with complete results included in Appendix A. When asked about hazards experienced, 80% of people reported experiencing extreme heat, followed by power outage and then flood. It is worth noting that 57% reported experiencing climate change. In terms of hazards of concern, wildfire was ranked the highest of all hazards. When asked about which Arizona (low water) Crossing is of biggest concern, over 50% of respondents named Pala Creek where it crosses Pala Temecula Road. Mitigating risk to these low water crossings has been included in the Mitigation Strategy. The majority of people who completed the survey are Tribal members and many of them live and work on the Reservation.

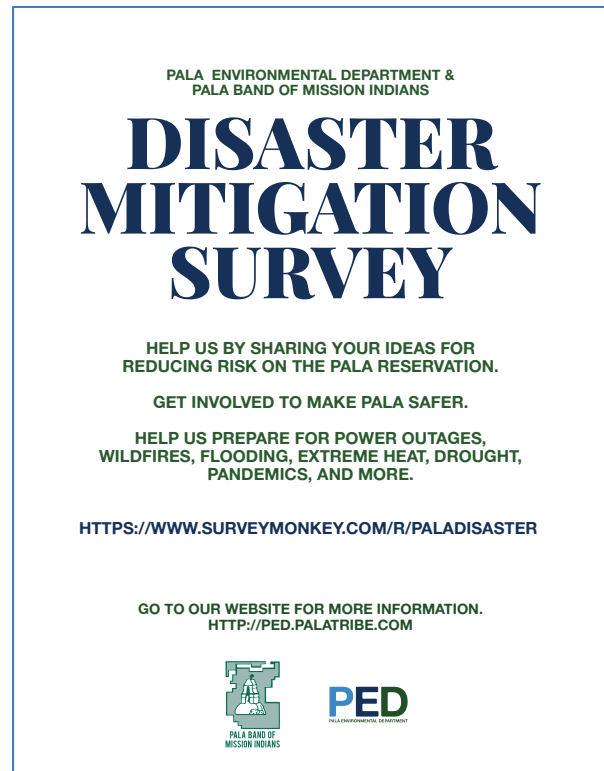


Figure 17. Flyer for Survey.

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3.3.2 Stakeholder Engagement

Meetings were held with key stakeholders for the purpose of gathering information regarding their pre- and post-disaster capabilities and collecting best-available data. In addition, all stakeholders were asked for their mitigation action ideas. Stakeholder meetings were held with the following departments:

- Pala Casino
- Pala Environmental Department
- Pala Executive Committee
- Pala Fire Department
- Pala GIS Department
- Pala Housing Department
- Pala Radio Station
- Pala Tribal Services

3.3.3 Neighboring Communities and Regional Partners

A3. Does the plan document, as appropriate, an opportunity for neighboring communities, tribal and regional agencies involved in hazard mitigation activities, agencies that have the authority to regulate development, as well as other interests, to be involved in the planning process? [44 CFR § 201.7(c)(1)(ii)]

a. Does the plan identify all tribal members/citizens, and partners who were given an opportunity to be involved in the planning process?

b. Does the plan identify how tribal members/citizens and partners were invited to participate in the planning process?

The Pala Band of Mission Indians participates generously and actively with their neighboring communities and regional associates. They have a history of making significant monetary contributions, lending human resources, and hosting collaborative efforts. The Pala Fire Department has a dozen memorandums of understanding in place and multiple informal working relationships. The Planning Team was actively involved in sharing the information from this plan with Tribal, local and regional agencies. The four organizations listed below are examples of how the Tribe participates beyond the reservation.

3.3.3.1 Southern California Tribal Chairmen’s Association

The Pala Band of Mission Indians is an active participant in the Southern California Tribal Chairmen’s Association (SCTCA). Pala’s Chairman Smith is the Chair of the SCTCA. SCTCA is a multi-service nonprofit corporation established in 1972 for a consortium of 19 federally recognized Indian tribes in Southern

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California. The primary mission of SCTCA is to serve the health, welfare, safety, education, cultural, economic and employment needs of its tribal members and descendants in the San Diego County urban areas. A board of directors comprised of tribal chairpersons from each of its member Tribes governs SCTCA.

SCTCA coordinates and administers numerous grant programs for its members and the southern California Indian community, including: Tribal Temporary Assistance to Needy Families (TANF), Law Enforcement, Food Commodities, Information Technology Services, Rincon Community Day Care, Adult Vocational Training, Career Development Center, Low Income Home Energy Assistance Program (LIHEAP), the Library Program, Child Care Development Services, Tribal Digital Village (TDV) and Resource Prevention Program. More information regarding SCTCA and their events can be found on their website: <http://www.sctca.net>.

3.3.3.2 Inter-Tribal Long-Term Recovery Foundation

The Inter-Tribal Long-Term Recovery Foundation (ITLTRF) is a tribal non-profit organization with the mission to strengthen and coordinate disaster services on tribal lands in Southern California. Pala Tribal Chairman, Robert Smith is the Treasurer for this organization. More information about ITLTRF can be found on their website: <http://www.itltrf.org>.

3.3.3.3 Tribal Transportation Planning Meetings

This is an interagency technical working group on tribal transportation issues. Pala Environmental Department staff members attend this meeting, both to bring information back to update the tribe on potential hazard-related impacts and to bring up Pala tribal concerns for future impacts. Information regarding these meetings may be found here:

<https://www.sandag.org/index.asp?committeeid=84&fuseaction=committees.detail>.

3.3.3.4 Indian Health Service Event

Pala Environmental Department staff provided brochures and information on various climate-change related impacts (e.g.: drought, extreme heat, flooding, wildfire), and how to develop a family emergency plan.

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3.4 Review and Incorporation of Studies and Reports

A4. Does the plan describe the review and incorporation of existing plans, studies, and reports? [44 CFR § 201.7(c)(1)(iii)]

a. Does the plan describe what existing plans, studies, and reports were reviewed?

b. Does the plan document how relevant information was incorporated into the mitigation plan?

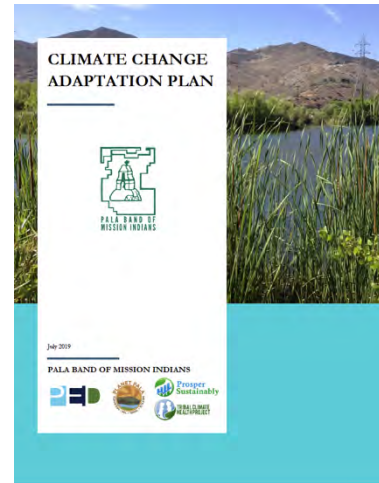


Figure 18. Climate Adaptation Plan Cover.

Development of this Plan included review of several relevant plans, which are named below. Additional capabilities were reviewed and are included in Chapter 5: Capability Assessment.

1. 2018 California State Hazard Mitigation Plan
2. 2018 County of San Diego Hazard Mitigation Plan
3. Pala Band of Mission Indians Ordinances
4. Pala Water Distribution Atlas
5. Pala Climate Change Adaption Plan, 2019 (cover shown above)
6. Pala Climate Change Vulnerability Assessment, 2019
7. When our Hearts are Happy: A Tribal Psychosocial Climate Resilience Framework, 2019
8. A Tribal Planning Framework – Climate Change Adaptation Strategies by Sector
9. Pala General Construction Procedures, 2018

3.5 Integrating the Planning Process with other Planning Efforts

A5. Does the plan include a discussion on how the planning process was integrated to the extent possible with other ongoing tribal planning efforts as well as other FEMA programs and initiatives? [44 CFR § 201.7(c)(1)(iv)]

a. Does the plan describe how the tribal government integrated the current planning process and/or findings with other ongoing tribal planning efforts?

b. Does the plan describe how the tribal government integrated the current planning process with other FEMA programs and initiatives?

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The PEDAG quickly identified ways the hazard mitigation plan could integrate with other plans and programs on the Reservation in their areas of expertise. During PEDAG meetings discussion ensued regarding how to integrate the hazard mitigation plan's data, risk assessment, and goals to inform land use and development decisions on the Reservation. The Tribe adheres to California Building Codes for all Tribally funded development. They also have expanded their GIS capabilities and work to collect hazard data to assist with land use decisions and development. The Pala Environmental Department has assumed responsibility for the Hazard Mitigation Plan and developed the PEDAG which brings the majority of Tribal Departments to the table to discuss hazard mitigation. The Pala Fire Department has functioned as a leader in hazard mitigation and continues to implement pre- and post-disaster mitigation activities. In addition, Tony Ravago, Fire Chief, has become the Senior, Vice Chairman on the Pala Executive Committee bringing a high level of knowledge and commitment to hazard mitigation directly to the Executive Committee.

The best way to ensure this Hazard Mitigation Plan remains current and essential to the Pala Band of Mission Indians is for the Tribe to integrate the plan into current and future planning efforts. The Tribe has a history of integrating the hazard mitigation plan into decisions related to hazard mitigation such as zoning, building codes, housing, and economic development. The Tribe has used the plan since it was originally drafted. For instance, the development of the radio station was one of the first mitigation actions identified to improve communication on the Reservation. The Tribal Executive Committee and Tribal department directors are committed to incorporating hazard mitigation principles into their plans, their education and outreach programs, and their structure and infrastructure projects.

3.5.1 County, State and FEMA Program Integration

The Pala Hazard Mitigation Plan is consistent with the San Diego County Hazard Mitigation Plan, the California State Hazard Mitigation Plan and FEMA programs. The San Diego County Multi-Jurisdictional Hazard Mitigation Plan, October 2017 has 13 goals.⁹ These goals are listed below.

1. Promote Disaster-resistant future development.
2. Increase public understanding and support for effective hazard mitigation.
3. Build and support local capacity and commitment to become less vulnerable to hazards.
4. Enhance hazard mitigation coordination and communication with federal, state, local and tribal governments.

“Reduce the possibility of damage and losses to existing assets, particularly people, critical facilities/infrastructure, and County-owned facilities, due to”:

5. Dam Failure

⁹

https://www.sandiegocounty.gov/content/dam/sdc/oes/emergency_management/HazMit/2018/2018%20Hazard%20Mitigation%20Plan.pdf

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6. Earthquakes and Liquefaction
7. Coastal Storm/Erosion/Tsunami
8. Landslides
9. Floods
10. Structural Fire/Wildfire
11. Extreme Weather and Drought
12. Manmade Hazards
13. Hazardous Materials Release

The 2018 California State Hazard Mitigation Plan Goals are:¹⁰

1. Significantly reduce life loss and injuries.
2. Minimize damage to structures and property and minimize interruption of essential services and activities.
3. Protect the environment.
4. Promote community resilience through integration of hazard mitigation with public policy and standard business practices.

FEMA's National Mitigation Framework¹¹ prioritizes reducing the loss of life and property by lessening the effects of disasters. The Framework includes seven core capabilities and a whole community approach. The Whole Community Approach resonates with the Pala Band of Mission Indians and the PEDAG. They agree with this approach and recognize that everyone can contribute to and benefit from preparedness efforts.

FEMA's new Building Resilient Infrastructure and Communities (BRIC) grant program replaces the Hazard Mitigation Grant Program. The Pala Band of Mission Indians recognizes this program and has written this Plan to be consistent with the Guiding Principles of BRIC. The BRIC Guiding Principles are:

- Support community capability and capacity building
- Encourage and enable innovation
- Promote partnerships
- Enable large infrastructure projects
- Maintain flexibility
- Provide consistency

Further defining BRIC's program are the four primary BRIC priorities:

1. Incentive public infrastructure projects
2. Incentive projects that mitigate risk to one or more lifelines

¹⁰ <https://www.caloes.ca.gov/cal-oes-divisions/hazard-mitigation/hazard-mitigation-planning/state-hazard-mitigation-plan>

¹¹ https://www.fema.gov/media-library-data/1466014552462-1b78d1a577324a66c4eb84b936c68f16/InformationSheet_Mitigation_Framework.pdf

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3. Incentive projects that incorporate nature-based solutions
4. Increase funding to Applicants that facilitate the adoption and enforcement of the latest published editions of building codes.

The PEDAG was made aware of these priorities and considered potential mitigation actions with an eye on funding eligibility. In addition, the Tribe recognizes the benefit of utilizing FEMA and other federal funding sources and adhering to federal standards such as the National Incident Management System (NIMS).

The tribe recognizes that maintaining this plan is a way to integrate with state and FEMA mitigation programs. This plan was completed in accordance with the FEMA Tribal Mitigation Planning Handbook (2019). When this plan is adopted and approved, the Tribe understands they will be eligible for pre- and post-disaster hazard mitigation funding.

3.6 Review of Draft Plan

A2. Does the plan document an opportunity for public comment during the drafting stage and prior to plan approval, including a description of how the tribal government defined “public”? [44 CFR § 201.7(c)(1)(i)]

B. Does the plan describe how the public was given the opportunity to be involved in the planning process?

The PEDAG and the public reviewed the draft plan over a period of two weeks in October 2020. Outreach for stakeholder and public review included posting the plan on the PEDAG webpage and making announcements to the public that the plan was available for review. In addition, a public comment form was available online. The plan’s availability was announced on the radio station, at in-person and virtual meetings, and via a flyer posted at several locations on the Reservation. The plan was also sent to the following organizations for their review:

- California Offices of Emergency Services
- Casinos in the region
- Climate Change Transportation
- Climate Tribal Alliance
- Fire Departments in the region
- San Diego Gas & Electric (SDG&E)
- Southern California Tribal Chairman’s Association (SCTCA)
- Tribal Programs in the Pacific Southwest (EPA program with a southern California sub-group)

Feedback from the public was reviewed by the Pala Environmental Department and the consulting team. The plan was revised accordingly and submitted to FEMA Region IX for their review.

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3.7 Plan Adoption

E1. Does the plan include assurances that the tribal government will comply with all applicable Federal statutes and regulations in effect with respect to the periods for which it receives grant funding, including 2 CFR Parts 200 and 3002, and will amend its plan whenever necessary to reflect changes in tribal or Federal laws and statutes? [44 CFR § 201.7(c)(6)]

E2. Does the plan include documentation that it has been formally adopted by the governing body of the tribal government requesting approval? [44 CFR § 201.7(c)(5)]

Following the two-week public review process, the Tribe sent the plan to FEMA Region IX for their review. Upon FEMA's review and designation of the plan as "Approved Pending Adoption," the Tribe scheduled a Tribal Executive Committee meeting to formally adopt the plan. The adoption resolution is included in the first few pages of this document. The adoption resolution demonstrates the Tribe's commitment to fulfill the hazard mitigation goals outlined in this plan and authorizes the implementation of the mitigation actions.

The Pala Band of Mission Indians assures compliance with all applicable Federal statutes and regulations with respect to the periods for which it receives grant funding, including 2 Code of Federal Regulations (CFR) Parts 200 and 3002, and will amend this plan whenever necessary to reflect changes in Tribal or Federal laws and statutes.