

Appendix A. Plan Integration Annex

A major objective of the hazard mitigation planning process is to describe the community’s process to integrate hazard mitigation principles and actions into other essential community planning processes such as comprehensive, stormwater management, transportation, sustainability, capital improvement, economic development, and area plans.

Plan integration is the process by which communities look critically at their existing planning framework and align efforts with the goal of building a safer and more resilient community. A community is successful in reducing risks in the long term when the information and recommendations of the hazard mitigation plan are integrated throughout government operations. Integration efforts involve a two-way exchange of information and incorporation of ideas and concepts between hazard mitigation plans and other community plans in order to identify consistent mitigation actions as well as opportunities to partner and collaborate. This collaborative effort is also important to monitor funding opportunities which can be leveraged to implement the mitigation actions.

A number of studies and planning processes have been completed in recent years that pertain to land use, development, transportation, housing, sustainability, and more in Cuyahoga County. These plans were reviewed to inform the recommendations in this section.

Section 1. Previous Integration Efforts

The first step in plan integration efforts is to identify existing plans of all communities in Cuyahoga County. Since this information was collected from each participating jurisdiction through the Capability Assessment forms (available in their respective annex), it was reused to inform the plan integration efforts as well. The plans were then analyzed to identify where hazard mitigation information and actions may be incorporated. The table below provides the list of local plans that include hazard mitigation considerations along with the ‘as-is’ language included in the plans.

Community Name	Plan/ Study Name	Plan/ Study Year	Hazard Mitigation Actions Integrated	Section in Plan
City of Bay Village	Bay Village Master Plan	2016	<p>Goal: Work with Cuyahoga County and other organizations to inventory and grade stormwater and sewer infrastructure and create an Improvement Plan to address the most critical needs. Action: This goal has five associated actions.</p> <p>Goal: Protect the water quality of Lake Erie and other local water sources. Action: Engage homeowners and businesses on responsible use and disposal of lawn and household chemicals and waste to eliminate hazardous runoff. Action: Implement riparian setback regulations along streams and the Lake Erie shoreline.</p>	Goals & Actions: Maintaining & Greening City Infrastructure
City of Beachwood	Beachwood Master Plan	2015	<p>Goal: Continue to Protect Critical Environmental Features Action: Enforce existing environmental regulations The City of Beachwood was forward-thinking in its protection of streams through the use of its riparian and wetland setbacks legislation (Codified Ordinances Chapter 1157). As new development occurs, the City should continue to</p>	Goals & Actions: Environment

2022 Cuyahoga County Hazard Mitigation Plan

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			<p>actively and steadfastly enforce stream setbacks to protect water quality and prevent flooding.</p> <p>Goal: Expand Beachwood’s Green Infrastructure and Services Action: Invest in green stormwater infrastructure The City of Beachwood holds an important location at the apex of numerous watersheds. This makes Beachwood’s stormwater management important not only for the residents of Beachwood but also for residents of numerous surrounding communities whose flood protection and clean drinking water rely on the health of waterways in Beachwood. With more than 20% of the City’s surface area covered by impervious surfaces such as parking lots, Beachwood ranks 18th in terms of most impervious surfaces among Cuyahoga County communities.</p>	
City of Brecksville	Brecksville Master Plan	2019	<p>Strategy: Preserve natural land features and steep slopes Action: Review and update existing ordinances to strengthen hillside protections</p> <p>Strategy: Expand waterway protections Action: Consider riparian setbacks for development</p>	Recommendations Environmental
City of Broadview Heights	Broadview Heights Master Plan	2021	<p>Goal: Embrace environmental assets Strategy: Conduct a sustainability audit of existing codified ordinances to identify changes that could foster sustainable development Strategy: Incorporate green features into existing neighborhoods, future development, and public improvements Strategy: Protect the City’s extensive environmental assets</p> <p>Additionally, design guidelines specify that design objectives must consider “Safety for all users from natural and man-made hazards”.</p>	Section 3: Community Vision, and Section 4: Goals, strategies, & Actions
City of Brooklyn	Brooklyn Master Plan	2020	<p>Goal: Exceptional services & facilities Action: Continue working with the Northeast Ohio Regional Sewer District (NEORS) on developing a stormwater mitigation plan to address flooding issues of Big Creek around Brookpark and Tiedeman Roads. Action: Incorporate sustainable building practices and technologies in City facilities to reduce long-term maintenance costs and protect the environment</p> <p>B. Implement or retrofit green stormwater infrastructure into city properties, especially parking lots or flood prone areas</p> <p>The Plan also mentions in its ‘modern design and developments regulations’ that “Encouraging sustainable development practices helps to reduce environmental system disruption and costs associated with infrastructure or damage. It also helps fight issues related to Climate Change.”</p>	Action Recommendations
City of Cleveland Heights	Cleveland Heights Master Plan	2017	<p>Goal: Promote and maintain the city’s longstanding tradition of diversity and actively foster an environment of inclusiveness Action: Enhance emergency responders’ relations through diversity outreach and training.</p>	Section 2: Community Vision

2022 Cuyahoga County Hazard Mitigation Plan

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			Goal: Continue to promote policies that limit exposure to environmental hazards	
Cuyahoga County	Cuyahoga Greenways Plan	2019	<p>The Plan recommends obtaining a phase I Environmental Site Assessment (ESA) that helps identify potential hazards and environmental liens upon the property.</p> <p>The Plan discusses how greenways/trails can provide environmental benefits, help manage stormwater, protect and restore habitat, and improve air and water quality.</p> <p>Design elements include recommendations for landscaping such as street trees, native plantings, and stormwater management facilities (bioswales, rain gardens, etc.).</p>	<p>Section 4.4 Additional Information</p> <p>Section 1.2 Greenway & Urban Basics</p> <p>Section 1.3 Design Approaches</p>
Cuyahoga County	Cuyahoga County Climate Change Action Plan	2019	<p>Strategy: Integrate climate change mitigation measures into the Cuyahoga County Office of Emergency Management’s All Hazards Mitigation Plan.</p> <p>Strategy: Integrate climate change data and projections into the Cuyahoga County Office of Emergency Management’s Emergency Operations Plan.</p> <p>Strategy: Create a County-wide tree fund, prioritizing planting in areas that are most vulnerable, per County Planning’s Vulnerability Assessment Tool.</p> <p>Appendix B provides the detailed Vulnerability Assessment that addresses climate-related hazards to the County as a whole, as well as how those threats might affect different sub-populations within the County. The social factors determining these populations are age, income and mobility, rental households, minority status, and educational attainment.</p> <p>The determining physical factors include impervious areas, areas in heat island, age of buildings, areas in a floodplain, and areas without tree canopy.</p>	<p>Focus Area: Natural Systems</p> <p>Appendix B</p>
City of Euclid	Euclid Master Plan	2018	<p>Goal: Restore, preserve, and enhance environmentally sensitive features throughout the city—including steep slopes, wetlands, waterways, and the waterfront</p> <p>Goal: Use green infrastructure to slow and store stormwater</p>	Goals and Actions: Preserve
City of Maple Heights	Maple Heights Master Plan	2019	<p>Action: Green infrastructure</p> <p>C. Review the City’s development codes to remove barriers to rain barrels, solar panels, and other green infrastructure elements</p> <p>D. Update parking lot standards for large-scale developments to require green stormwater infrastructure</p> <p>E. Work with NEORSD, Cleveland Metroparks, and private and non-profit partners to identify green infrastructure opportunities on both private and public properties</p> <p>Action: Open space protection</p> <p>G. Ensure that any new development of the City’s unfinished subdivisions handles all stormwater on site and includes green space</p> <p>H. Consider regulations to limit development within specified distances of existing streams, waterways, and wetlands</p>	Goals & Actions: Citywide Framework - > Goal 5: Protect the City’s Critical Environmental Features

2022 Cuyahoga County Hazard Mitigation Plan

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City of Cleveland	Cleveland Tree Plan	2015	<p>The Plan integrates the benefits and makes recommendations for promoting a richer urban tree canopy in order to help mitigate the following hazards: Flooding and Water Pollution Reduction Erosion prevention Lessening the Impact of High Heat Days Habitat for wildlife</p> <p>Action: Develop and Implement a Management Plan for City-Owned Trees. Through this management plan, the community will be able to set goals, metrics, and answer questions that are essential to public safety such as: Are all trees in highly trafficked areas visited annually? What is the city’s threshold for acceptable risk? Is there a tree emergency management process in place? Is it part of a larger disaster or storm response plan?</p>	<p>Why Trees?</p> <p>The Way Forward</p>
Village of Mayfield	Mayfield Village Master Plan	2018	<p>Flooding issues have been identified in the southwestern portion of the Village near North and South Woodlane Drives and Norman Lane.</p> <p>Goal: Provide sustainable and efficient infrastructure improvements Action: Work with residents to create a Village-wide stormwater plan to identify and address flooding issues throughout the Village</p>	Village-wide Framework: Land Use Actions
City of Middleburg Heights	Middleburg Heights' Community Master Plan (draft)	2021	<p>Key Principle: Prepare for flood and storm control measures through careful landscape and parking lot designs, wetlands monitoring, and improved tree protections.</p>	<p>1.1 Connectivity & Infrastructure</p> <p>1.5 Target Community Areas</p>
Village of Woodmere	Woodmere Master Plan	2021	<p>Strategy: Adopt regulations to encourage sustainable development practices, designs & high-performance buildings. Objectives: Consider the physical protection of a building’s occupants and assets through fire prevention and mitigating both man-made and natural hazards</p> <p>Strategy: Install village-wide wireless networks to create a “smart” community. - Technology Ecosystems can help communities develop a smart city mindset that can lead to improved welfare and protection from crime, hazards, and disasters.</p> <p>Strategy: Encourage inclusive sustainability best practices for businesses. The Village of Woodmere should work with business owners when alterations to their structures are proposed or other “activating events” occur to ensure that appropriate measures are taken at the maximum extent feasible to eliminate or reduce obstacles to accessibility. A “activating event” could include a planned remodel to an existing structure or an unplanned event such as a severe weather threat, fire, flood, or other environmental factor that destroys a certain percentage of a structure’s critical construction (foundation, facade, roof, etc.) beyond repair.</p>	<p>4.2 Strategies for Branding</p> <p>4.3 Strategies for Marketing</p> <p>4.4 Strategies for Mobility</p>
City of Olmsted Falls	Olmsted Falls Master Plan	2016	<p>Goal: Incorporate Innovative Stormwater Management In new and Existing Developments. Action: Incentivize the use of innovative stormwater techniques</p>	Goals and Actions: Parks, Recreation, and the Environment

2022 Cuyahoga County Hazard Mitigation Plan

Community Name	Plan/ Study Name	Plan/ Study Year	Hazard Mitigation Actions Integrated	Section in Plan
			Action: Review the Zoning and Building Codes for obstacles to innovative stormwater solutions like downspout disconnects, rain barrels, and innovative parking lot designs Action: Consider a complete and green streets policy that incorporates innovative stormwater management practices Goal: Adequately Protect the City’s Environmentally Sensitive Areas Action: Actively enforce stream setbacks to restrict development in flood-prone areas, thereby minimizing flooding and protecting the City’s natural resources Action: Partner with conservation organizations to purchase easements along the City’s rivers to protect them in perpetuity Action: Establish hillside protection regulations to limit development on hillsides Action: Protect existing wetlands as a way to reduce flooding	

Section 2. Future Integration Efforts

This section contains example strategies and policy recommendations that entities can use to integrate hazard mitigation into local planning mechanisms. The items below can be adopted into municipal plans following the lead of the County to ensure a more complete and consistent planning effort across the County.

2.1. Comprehensive Land Use & Development Plan, Subdivision and Zoning Ordinances, Building Codes, and Floodplain Ordinances

Cuyahoga County has identified that over the past five years there has been a declining population as well as an aging population. According to the Ohio Department of Development, Cuyahoga County is projected to have a 1,113,950 population by 2040. As communities within the planning area experience a population decline, vacant and blighted properties become an increasingly significant issue especially during hazard events such as high winds, thunderstorms, and tornadoes (Section 2, Base Plan).

Comprehensive Land Use Plans guide the future growth and development of a community for many years to come. These plans examine all aspects of the community from population, housing, transportation, socioeconomic factors, natural resources, utilities, and more. Land use policies can build community resilience by taking information on the location, frequency, and severity of hazards into consideration. As described in Section 2 of the Base Plan, socioeconomic factors influence the amount of risk certain populations may be subjected to compared to others due to their employment status, household composition, minority status, and/or means of transportation. For the physical environment, aging infrastructure, impervious surfaces, and a receding shoreline increase the county’s vulnerability.

During unpredictable times like an epidemic/pandemic, regulations should be flexible and adaptable to allow temporary and immediate changes such as providing wider sidewalks and allowing more outdoor dining.

2022 Cuyahoga County Hazard Mitigation Plan

Special consideration must be given to urban and high-density areas as these are more susceptible to the spread of diseases as people live in closer proximity to one another.

As seen in the Capability Assessment annex, most communities have a comprehensive plan but not all of these plans integrate hazard mitigation actions. The following policies are examples that can be included in the comprehensive plans and implemented through zoning and building codes, capital improvements programs, floodplain ordinances, and permitting processes:

- Monitor population growth and/or decline and maintain inventory of vacant properties
- Identify the correlation between various socioeconomic factors and map the populations most vulnerable to hazards
- Reduce risks to life and property in high hazard areas by limiting high-density development
- Limit the extension of public infrastructure in high hazard areas
- Reduce the vulnerability of future development in high hazard areas by reviewing development regulations
- Set design standards for all new construction or redevelopment that take potential hazards into account
- Designate potential impact areas related to flooding and dam failure for limited to no development
- Future land use maps should include high hazard areas, with high risk factors, such as:
 - Wind speed zones over 100 miles per hour or special wind regions
 - 1-percent and 0.2-percent annual chance flood
 - Coastal flood zones and Erosion areas
 - Areas subject to drought and/or wildfire
 - Seismic hazard zones
 - Railroads, highways, or waterways that regularly carry significant quantities of hazardous materials
 - Vulnerability zones (10-mile emergency planning zone) of a nuclear power plant
 - Identified inundation zones of a “high” or “significant” hazard dam
 - Landfills, oil/gas wells, pipeline terminals, storage facilities, production facilities, or compressor stations
 - High-volume commercial passenger airports and other passenger transportation terminals and facilities

2.2. Long-Range Transportation Plan and Mobility Plans (including Emergency Preparedness)

Transportation systems connect people to places as well as help move goods and supplies across the community. In times of an emergency, transportation systems and emergency and recovery response efforts become closely interconnected. To this end, transportation engineers, planners, and construction workers share a common goal with emergency managers: keeping the public safe.

After major hurricanes and storms, disaster relief funds are distributed through coordination between state, local, and federal highway, transit, and emergency management officials. During the ongoing COVID-19 pandemic, transportation systems were adapted in many different ways, from providing students with free mobile Wi-Fi hotspots via buses to becoming make-shift clinics on wheels. By applying principles shared by both the transportation and emergency management sectors, transportation systems and other critical infrastructure can be designed to withstand the effects of known hazards while maintaining versatility to manage the impacts of unforeseen hazards to function without interruptions.

- Coordinate with emergency services to develop a recovery element following a significant hazard event
- Develop an emergency access and evacuation network map that identifies the roadways in the county that must be maintained for emergency access and/or evacuation in case of a major hazard event
- Restrict heavy vehicles carrying hazardous materials in residential and other sensitive areas
- Develop a process to explore potential mitigation opportunities whenever there is new transportation-related construction, renovation, or repair
- Design transit stops to reduce risks to passengers during extreme weather conditions
- Assess urban parking lot regulations to mitigate flooding

2.3. Housing Policies and Plans

Housing is an essential indicator of the community's overall resilience during and after a disaster. These are places where people take shelter during a disaster event. Well-maintained homes are less likely to contribute to damage and debris during hazard events. Vacant homes are more likely to sustain heavy damage during events such as thunderstorms, high winds, tornadoes, and winter storms. Ensuring housing is built in compliance with building codes while keeping potential hazards in mind is essential for strengthening community resilience.

Furthermore, Cuyahoga County has an increasingly aging population, which leaves those in the County more susceptible to hazard events, particularly when additional shelter is required. Hazards such as extreme temperatures, tornadoes, severe winter storms, and severe thunderstorms can cause power outages that can cause the losses of heating and cooling, putting the elderly and the very young most at risk.

- Design rehabilitation programs to repair or replace structures identified as vulnerable to hazards
- Accommodate residential growth by encouraging the development of a mix of housing types and densities with special consideration to high hazard areas

2022 Cuyahoga County Hazard Mitigation Plan

- Ensure new and existing housing is designed and maintained or renovated to prepare for major seismic, wind, storm, and flood events
- Identify and mitigate repetitive flood loss structures
- Through outreach and education, encourage developers to include hazard mitigation measures for new construction and redevelopment
- Provide incentives to access eco-friendly heating and cooling equipment to households that are vulnerable to heat waves and lack air conditioning.

2.4. Economic Development Plan

It is expected that redevelopment as well as new development will continue to occur in Cuyahoga County in both the cities and villages alike throughout the next 25 years. One reason is that the retail and service market can continue to grow through new redevelopment methods in the jurisdictions of Cuyahoga County. Cuyahoga County is forecasting that approximately 16,073 new jobs will be added to the County between 2020 to 2024, with the highest number of jobs to be added in 2024 with 4,355 (Section 2, Base Plan).

The economic damage caused by disasters varies by hazard type and intensity. Economic development and resiliency have shared objectives to sustain and enhance community stability and sustainability. Hazards have the potential to bring a community's economy to a standstill when workers cannot access their jobs or when small businesses suffer from prolonged closure or structural damage. In Ohio alone, three months after the declaration of the COVID-19 pandemic, 1.5 million people had filed for unemployment in the State.

Hazard mitigation can be integrated with economic development policies by promoting commercial or industrial expansion in areas that are not vulnerable to damage or disruption from hazards, and by making community resilience a key feature in attracting, expanding, and retaining businesses and industry.

- Identify the interrelationships between natural disaster loss, economic development, socio-economic and geographic factors in the community
- Identify hazard zones for integration with community planning and capital improvement funding processes
- Discourage commercial or industrial expansion in areas that are vulnerable to damage or disruption from hazards
- Complete a detailed economic hot spot analysis describing risk in key economic areas
- Identify critical structures in the County with high economic impacts
- Identify populations especially vulnerable to hazards and in need of greater assistance

2.5. Capital Improvement Plans and Programs

Capital Improvement Plans and programs typically include important public assets such as roadways, dams and bridges, fire stations, sewer lines, utility systems and power lines, water supply and storage facilities,

2022 Cuyahoga County Hazard Mitigation Plan

wastewater treatment facilities, and other critical infrastructure that are vital to community functions. These can be damaged or destroyed during a disaster event. Sudden natural disasters, such as earthquakes, tornadoes, storms, and floods can cause immediate devastation whereas slow-onset disasters, such as droughts, cause ongoing damage over time.

Depending on the scale of the disaster, federal, state, and local governments, invest heavily in restoring and rebuilding damaged and destroyed assets. Capital Improvement Plans are the primary means through which mitigation actions get prioritized and funded. The incorporation of hazard mitigation goals and priorities into Capital Improvement Plans supports community resilience and warrants careful assessment of risk through the hazard identification and risk assessment process.

- Avoid the extension of public facilities and services into areas that are vulnerable to hazards.
- Limit long-term public investment in areas identified as subject to repetitive damage from disasters
- Protect critical facilities such as hospitals, police stations, fire stations, water treatment plants, and emergency operation centers from hazard-related damages through resistant structural retrofits
- Implement flood protection measures for water or sewer facilities
- Establish goals and policies in support of stormwater drainage improvements
- Avoid disruption in utility services and mitigate damage to overhead and underground power lines during and after a disaster event
- Replace and/or repair damaged and aging infrastructure and facilities with structural retrofits, keeping hazard mitigation and community resiliency in mind

2.6. Environmental, Natural Resources, Parks, Open Space, Greenways, and/or Recreation Plan

With Ohio's climate changing, the State has warmed over the last century. Floods have become more frequent, as demonstrated by probability calculations as well as the Hazard Mitigation Planning Committee (HMPC), determining that flood events are "highly likely" and have a 100% annual chance of occurring. The ice cover on the Great Lakes is melting earlier and the ice-free season along the Great Lakes is becoming longer. In the coming decades, the State will likely have more extreme temperature days, which can harm public health and agriculture.

Near the shoreline, the County is part of the Erie Lake Plain ecoregion. Here, the warmer water temperatures can cause more algal blooms, which can be unsightly, harm fish, and can degrade drinking water quality. Severe summer and winter storms also increase pollutant run off from land to water, so the risk of algal blooms is greater if storms become more severe. Increasingly severe storms can also cause sewers to overflow into Lake Erie, threatening beach safety and drinking water quality. Increasingly hot summers and more severe droughts or floods are also likely to hurt crop yields.

Natural resources and hazard mitigation have multiple areas of overlap and provide many opportunities for integration. Policies designed to preserve or enhance environmental areas of concern, such as wetlands, riparian corridors, and floodplains, often include the added benefit of avoiding or minimizing development in

2022 Cuyahoga County Hazard Mitigation Plan

hazard areas. Plan integration will help bring all local officials onto the same page about potential flood prone areas near infrastructure such as roads, bridges, and buildings.

- Protect and restore natural vegetation and other natural resources that provide floodplain protection, minimize erosion, stabilize slopes, or provide other ecosystem services
- Convert vulnerable floodplain land, steep slopes, and areas vulnerable to other hazards into open space or passive recreational areas to help avert or minimize disasters
- Encourage green infrastructure, open space, and urban forestry programs to mitigate flood related vulnerabilities
- Encourage plantings of native plant species to reduce water use, prevent erosion of soils, improve habitat, lessen fire danger, and minimize degradation of resources
- Coordinate with Northeast Ohio Regional Sewer District (NEORS) to discuss what measures need to be taken to prepare and retrofit water control structures to offer flood protection

2.7. Culture and Historic/Heritage Preservation Plans

Historic structures and cultural resources are often irreplaceable. Seeking to preserve, protect, rehabilitate, and restore cultural resources can have a significant positive impact on a community's overall health. Policies to protect and preserve such sites and resources may be linked with existing mitigation actions to prevent damage or losses from hazards.

- Include an inventory of historic structures and cultural resources in hazard mitigation plans
- Establish policies aimed at protecting these unique resources consistent with the location, design, or material to be preserved

2.8. Other Future Integration methods

2.8.1 Use Hazard Profiles and Risk Factors and Evaluation to inform Plan Integration

The Risk Factor provides the order of priority of each hazard impacting Cuyahoga County and Risk Evaluation provides the list of hazards that have changed in regard to risk within each jurisdiction since the previous HMP. The hazard profiles provide baseline data, historical events, vulnerability assessment, probability of future occurrences, land use and development trends, and maps that can be integrated into other plans to inform policies and decision-making. The hazard profiles can form the basis for emergency operations and evacuation planning and can be used to site and design public facilities to minimize exposure to hazards.

2.8.2 Build pre- and post-disaster mitigation actions into existing plans

Mitigation actions reduce long-term vulnerability through effective building code adoption and enforcement that are applied in both the pre-disaster mitigation planning and post-disaster recovery activities of a community. Effective recovery planning builds on existing community goals and plans and incorporates the mitigation strategy into long-term recovery and reinvestment decisions (Source: FEMA)

2022 Cuyahoga County Hazard Mitigation Plan

2.8.3 Interagency Coordination - Review and Maintenance

Local government plays a major role in the execution and implementation of mitigation strategies. Implementation happens in large part during the daily operations that guide the development of various communities in the County. As such, each community is responsible for understanding which actions they should implement.

- The Planning Committee and Community Stakeholders may meet annually in order to:
 - Identify other local topic-specific coordinators to be involved in the annual review meetings and process
 - Monitor and evaluate the Cuyahoga County Hazard Mitigation Plan
 - Identify how the current mitigation strategy, including the goals and hazard mitigation actions, will be incorporated into other planning mechanisms over the next 5 years.
 - Review integration efforts in ongoing and upcoming plans in the County
 - Update hazard profile information and priority ranking
 - Conduct regular reviews of flood maps and zones
- Make the meetings available to the public.
- Discuss the budget process during the meetings to determine future funding sources and set aside actions slated for that particular year.
- Ask each local jurisdiction and the County to review the Hazard Mitigation Plan during other planning processes. They will make a concerted effort to integrate the Hazard Mitigation Plan and its mitigation actions into existing plans and regulations.
- Develop a single data repository to disseminate accurate and consistent information relating to hazard mitigation.

Both the Hazard Mitigation Plan and the Comprehensive Plan are key documents in a community, but they are often developed separately with little coordination between the two planning processes. This disconnection occurs with other local community plans as well.

Local plans, zoning ordinances, subdivision regulations, and capital improvement programs provide a framework for the physical design and development of a community over short- and long-term planning horizons. They address social, economic, and environmental issues by the way they guide overall growth and development. Awareness and identification of hazards in all community planning processes can help the community avoid expensive development in sensitive areas where infrastructure and buildings would suffer damage. Coordinating with communities' comprehensive plans can provide a mechanism for implementing the mitigation goals, objectives, policies, and actions in the Hazard Mitigation Plan beyond federal mitigation grants and recovery operations. Plan integration thereby establishes resilience as an overarching value of a community and provides the opportunity to continuously manage development in a way that does not lead to increased hazard vulnerability.