

## Section 3: Debris Management Planning Concepts

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### Mission Introduction

The City of Leesburg Department of Public Works Disaster Debris Management Plan is the first step in developing a City-wide debris plan. This debris plan will be an important resource for responding to and recovering from natural and man-made disasters. Importantly this section puts debris management in the larger context of a disaster. Health and safety issues are paramount when responding to a disaster; however environmental and economic issues are extremely important for the long-term recovery of our City. This plan outline is as follows:

- Debris Management Staff Roles and Responsibilities
- Situation and Assumptions
- Debris Collection Plan
- Debris Management Sites
- Contracted Services
- Private Property Debris Removal and Demolition
- Public Information Strategy

### A. Situation and Assumptions

This section discusses the types of disasters that may threaten the City of Leesburg and the types of debris these disasters may generate. This section estimates the types and quantities of debris generated by these disasters through:

- Creation of a debris forecasting model
- Calculation of the debris associated by hypothetical events
- Estimation of the number and types of needed contractual services
- Determination of the necessity for storage and processing locations

### B. Debris Management Staff Roles and Responsibilities

The City of Leesburg Department of Public Works (DPW) will be responsible for the review of this plan. The DPW will guide the formation of the plan and be sure that it is practical and operational. The DPW will be responsible for assigning staff to a Debris Management Task Force (DMTF) that will consist of representatives of the following City Departments /Divisions:

- Department of Public Works Administration
- Division of Solid Waste
- Division of Fleet Services
- Division of Street Maintenance
- Division of GIS/Engineering
- Department of Recreation and Parks
- Division of Facility Maintenance

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### C. Debris Collection Plan/Operations

This section discusses debris collection operations, which are normally broken into two phases: response and recovery. An efficient debris management plan includes collection activities for response and recovery debris strategies. Response occurs sometimes during and always immediately after an event in order to clear emergency access routes. The recovery operation usually begins after the emergency access routes are cleared and the residents return to their homes and begin to bring debris to the public right-of-way. This section discusses:

- Priorities
- Response Operations
- Recovery Operations
- Estimating Staff, Procedures and Assignments
- Collection Method (Curbside Collection, Collection Centers)
- Collecting Hazardous Waste and White Goods
- Monitoring Staff and Assignments

#### 1. *Preliminary Damage Assessment*

The Preliminary Damage Assessment (PDA) is a process used to determine the impact and magnitude of a disaster's damage on individuals, families, businesses, and public property. It is the responsibility of local officials to bring disaster impacts to the attention of state officials. It is then the responsibility of the Governor to use the information gathered by state and local officials during the PDA process to determine if federal assistance should be requested.

Local government is the first to respond to a disaster. Response efforts are first directed to activities that protect lives and public health and safety, such as evacuations and sheltering, fire fighting, utility restoration and clearing roads of debris. Damage assessment should be conducted to identify necessary life-saving actions, assess magnitude of the damage, and determine if additional resources are needed. When a disaster occurs and a locality has responded to the best of its ability, but is overwhelmed by the magnitude of the damage, it turns to the State for help.

The PDA is conducted once the State determines that the recovery effort is beyond state and local capabilities. A team is made up of officials from the Federal Emergency Management Agency (FEMA) along with State officials from the Florida State Emergency Response Team (SERT). Local officials round out the PDA Team. The task of the PDA team is to:

- Inspect the damage first hand
- Determine the scope of the damage
- Estimate recovery costs

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### 1. *Preliminary Damage Assessment (Cont'd)*

The results of the PDA process will determine whether or not the Governor requests Federal involvement in the recovery process. The governor's request is addressed to the President by submittal through the appropriate FEMA Regional Director. After a Presidential Declaration has been made, FEMA will designate the areas eligible for federal assistance and will announce the types of assistance available. FEMA provides supplemental assistance for State and local recovery expenses and the Federal share will always be at least 75% of eligible costs. The remaining 25% of the costs may be split by the State and the local community.

### 2. *Step by Step process of Response and Recovery*

Typically there are two major phases to a disaster debris management strategy. The first is called Phase I and concerns the removal of debris that could cause an immediate threat to public safety (i.e. high unstable structures, clearing of roadways, etc.). The second is called phase II and concerns the long-term debris removal and management that is associated with recovery. This summary is a step-by-step process of how a local government initially responds to and begins recovery from an emergency/disaster that has generated significant amounts of debris. The summary tries to put the debris management efforts in context of an entire emergency/disaster event. Finally, this summary recognizes the important step of public assistance for local communities to meet the costs of debris management.

#### **a. Summary**

- When an emergency occurs or a disaster strikes, local governments first use their own resources and response capabilities. Conventional waste collection equipment will have very limited use of the initial response. End-dump trucks, excavators with grapples and wheeled bucket loaders will be more effective for removing debris.
- Responsibility for coordination of the local emergency activities rests with local elected officials as outlined in the local Comprehensive Emergency Management Plan (CEMP). When the emergency or disaster has depleted, or threatens to deplete, the municipal response capabilities, local elected officials will make a request for state assistance. Local governments may need to request mutual aid from neighboring municipalities. If the emergency escalates usually the local Emergency Management Director, who is typically a trained town official, police officer, firefighter, or Emergency Medical Services personnel, will become the on-scene commander.
- The request for assistance is channeled through the State Emergency Management Agency to the Office of the Governor. The State Emergency Operations Center may be activated and operated under the Incident Command System and staff by the State Emergency Management Team. Debris removal and clearance is included.

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### 2. *Step by Step process of Response and Recovery (Cont'd)*

#### a. Summary (Cont'd)

- Depending on the severity of the emergency/disaster the State Emergency Management Agency may deploy a Rapid Impact Assessment Team to the municipality. One of the functions of the Rapid Impact Assessment Team is to evaluate the extent of the damage and determine the level of emergency/disaster.
- Chief Elected Officials, in coordination with local Emergency Managers, will declare a local state of emergency and make a formal request for State assistance to the State Emergency Management Agency. They will, when needed, recommend that the Governor declare a State of Emergency for the commonwealth.
- When it is apparent that the response to an emergency/disaster event exceeds the resources and capabilities of the commonwealth, the State officials will notify officials at FEMA of the Governor's forthcoming request for Federal assistance and a Presidential Disaster Declaration. Federal public assistance to municipalities is dependent upon the Presidential Disaster Declaration.
- FEMA will deploy a Liaison Officer when a Presidential Disaster Declaration appears imminent. The Florida Governor appoints a State Coordinating Officer who is usually the Director of the State Emergency Management Agency. The Director delegates responsibility for all state financial commitments as a result of the disaster or emergency to the Disaster Recovery Manager. Under the direction of the Disaster Recovery Manager, a Disaster Field Office may be established and staff resources deployed. Staff at the Disaster Field Office will interface with local officials. All of the State Emergency Support Functions are available for recovery activities under the direction of the Disaster Recovery Manager.
- Once the response phase of the emergency/disaster has been implemented, the Preliminary Damage Assessment (PDA) process begins. The results of the PDA will determine whether or not the Governor requests federal involvement in the recovery process. The Preliminary Damage Assessment is conducted by a team made up of officials from FEMA, along with State Officials from the State Emergency Management Agency. Local officials round out the Preliminary Emergency Assessment Team. The tasks of the PDA Team are to inspect the damage first hand, determine the scope of the damage, and estimate recovery costs.
- The results of the PDA will determine whether or not the Governor requests federal involvement in the recovery process. The Governor's request is addressed to the President, but submitted through the appropriate FEMA Regional Director. After a Presidential Declaration has been made, FEMA will

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### 2. *Step by Step process of Response and Recovery (Cont'd)*

#### a. Summary (Cont'd)

designate the areas eligible for federal assistance and will announce the types of assistance available. FEMA provides supplemental assistance for state and local recovery expenses and the federal share will always be at least 85% of eligible costs.

- Public Assistance is based on the scope of damage and estimated recovery costs determined by the Preliminary Damage Assessment (PDA). The federal threshold for a FEMA declaration is \$7.2 million dollars in damages across the whole State.

#### b. Projects and Project Worksheets

A “project” is the method used by FEMA for performing work as a result of a declared event. An example of a debris removal project may be the work that has been done, or will be done, by a single contractor or a single work crew. The “project worksheet” is a tool used by the applicant (community) and FEMA to develop projects. For small and large projects the community is responsible for maintaining supportive documentation and FEMA stores that information in a case management file. In 2006, \$57,800 is the threshold that determines a small vs. large project. A sample project worksheet is included (**Appendix V**).

#### c. **Costs**

An appointed public assistance officer is responsible for administering the public assistance program along with a state counterpart and they are responsible for defining the eligible costs of the projects. They determine if a cost is reasonable, and that it is both fair and equitable for the work being performed. There are several ways reasonable costs are established:

- Historical documentation for similar work,
- Average costs for similar work in the area,
- Published unit costs,
- FEMA cost codes,
- FEMA equipment rates.

The reasonable cost requirement applies to all labor, materials, equipment, and contract costs awarded for eligible projects.

*Once the project worksheets have been completed and cost estimates for disaster recovery have been determined, local governments can apply to FEMA for public assistance through a State appointed Public Assistance Officer.*

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### **D. Debris Management Sites**

Prior to a disaster, it may be necessary to establish temporary sites for debris storage, processing and transfer. These are frequently used to increase the operational flexibility when landfill space is limited or when the landfill is not in close proximity to the debris removal area. This section discusses and includes:

- GIS Mapping of Existing Temporary Debris Management Sites
- Site Management
- Establishment and Operations Planning

### **E. Contracted Services**

This section deals with the private sector contracting of debris management services. Because the very nature of a disaster declaration means that local resources, State resources, mutual aid agreements, and volunteer labor have been exhausted, turning to the private sector for assistance is necessary for disaster response and recovery. This section discusses and includes:

- Emergency Contracting/Procurement Procedures
- Debris Operations to be Outsourced
- General Contract Provisions
- Qualification Requirements
- Solicitation of Contractors

### **F. Private Property Debris Removal and Demolition**

Demolition and debris removal from private property is an extremely document-and-labor-intensive operation. The planning staff is responsible for assigning tasks to the appropriate departments and labor forces. This section discusses:

- Condemnation Criteria and Procedures

### **G. Education and Public Information**

This section outlines the plan for developing a coordinated, regional, education and public information program. This section discusses:

- Public Information Officer
- Pre-scripted Information
- Distribution Strategy

### **H. Public Assistance Program**

After a disaster, a local community's available reserves and discretionary funds are rapidly depleted. This problem may be exacerbated by the decrease in the local tax base due to the disaster's impact on revenue generating activities. This results in a community's reliance on receiving timely reimbursements from the State and Federal Government. This

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### H. Public Assistance Program (Cont'd.)

is an extremely important element of the recovery process. The Public Assistance Program is the process established by FEMA to award grants to assist state and local government with response to and recovery from disasters. Following the declaration of a disaster, the state will coordinate a kick-off meeting between local communities, called **applicants**, and the assigned FEMA Public Assistance Coordinator. This meeting is held to review the list of damages identified in the Preliminary Damage Assessment (PDA). The Public Assistance Coordinator is responsible for assessing disaster-related needs and developing projects to address those needs. FEMA funds are available to reimburse local communities for the collection, processing, and disposal of debris, but only if FEMA guidelines are followed. The City of Leesburg Public Works Disaster Debris Management Planning Document will incorporate all the FEMA guidelines and directives.

While recovery projects are under review for reimbursement, local and State officials should not delay in taking actions to respond to and begin recovery from the disaster. Such actions should not be dependent upon whether there will be Federal assistance. The rules of basic eligibility for public assistance state an item of work:

- Be required as a result of the major disaster event,
- Be located within a designated disaster area, and
- Be the legal responsibility of an eligible applicant.

#### 1. **Public Assistance Process Overview**

- An **Applicant's Briefing** is held for potential public assistance applicants in a meeting organized by a representative of the State. This happens after a major disaster has been declared. The agenda for the briefing includes: application procedures, administrative requirements, funding, and program eligibility criteria. To obtain maximum benefit from the briefing, each applicant should send community officials that are knowledgeable about the damages.
- The **Request for Public Assistance** is an applicant's notification to FEMA of the intent to apply for public assistance. A form is provided to the applicant for this formal notification. The form asks for general information such as applicant's name, address, primary and secondary contacts. Applicants must submit the form within 30 days of the disaster declaration. Applicants do not need to wait until all the damage is identified before requesting assistance.
- **Assignment of the Public Assistance Coordinator (PAC)**. Once the Request has been forwarded to FEMA, the applicant is assigned a Public Assistance Coordinator. The PAC is a FEMA expert who manages the processing of the applicant's projects.
- **A Kickoff Meeting** is usually held within one week of FEMA's receipt of an applicant's request and is designed to provide a much more detailed review of the public assistance program. This meeting establishes eligibility and documentation requirements that are most important to an applicant.

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### H. Public Assistance Program (Cont'd.)

#### 1. Public Assistance Process Overview (Cont'd.)

- **Project Formulation** is the process of identifying the eligible scope of work and the associated costs. A project worksheet is the primary form used by FEMA to document the scope of work and estimate the costs for a project. Projects are divided into two groups and based on a monetary threshold that is adjusted each fiscal year. Small project funding is based on estimated costs if actual costs are not available. Large project costs are based on documented actual costs. However, due to the complexity and nature of most large projects they are initially approved for funding based on estimated costs. There are time limits established for completion of eligible work. For a debris clearance project this work must be completed in six months of the declaration date of the emergency or disaster.
- **Validation** is conducted only for applicants who are preparing project worksheets for small projects. Large projects are not validated. Project worksheets are the responsibility of the project officer who is generally knowledgeable of the public assistance program. Applicants have sixty days to submit all small project worksheets. Validation becomes a much stricter process if applicants do not meet this deadline.
- **Grant Processing** is a shared responsibility of the State and FEMA. FEMA obligates funds to the State and the State awards grants to the applicants as soon as possible. Large projects are funded on documented actual costs. Progress payments are made to the applicant as actual costs are documented. There is an appeal process for applicants to request reconsideration of decisions regarding the provisions of assistance.
- **Closeout** of the public assistance program occurs when all projects have been described and approved, appeals have been resolved, and funds have been obligated.

#### 2. Debris Removal

FEMA divides disaster related work into seven categories in order to facilitate the process of public assistance grants to cover the costs of debris clearance. These categories are further divided into emergency work and permanent work. Debris removal is considered emergency work and is known as **Category A – Debris Removal**. To be eligible for assistance, debris removal projects must be deemed necessary to accomplish one of the following:

- Eliminate immediate threats to lives, public health and safety;
- Eliminate immediate threats of significant damage to improved public or private property;

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### H. Public Assistance Program (Cont'd.)

#### 2. *Debris Removal (Cont'd.)*

- To ensure economic recovery of the affected community to the benefit of the community-at-large;
- Mitigate the risk to life and property by removing substantially damaged structures and associated appurtenances as needed to convert property acquired through a FEMA hazard mitigation program to uses compatible with open space, recreation, or wetlands management practices.

#### 3. *Debris Removal from Public Property*

Debris on public property that must be removed to allow safe operations of government or to alleviate an immediate threat is eligible for funding. Debris that is blocking streets and highways is a threat to public health and safety because it blocks the passage of emergency vehicles or it blocks access to emergency facilities such as hospitals. Debris in a natural stream may cause flooding in a future storm. If such flooding causes an immediate threat of damage to improved property, debris removal, to the extent necessary to protect against an immediate threat, is eligible. But, not all public debris is eligible. For instance removal of fallen trees in an unused forested area would not be eligible. Debris removal from public or private agricultural land is not eligible,

Additional eligible debris are those materials cleared from roads and highways, including the travel lanes and shoulders, roadside ditches and drainage structures, and the maintained right-of-way. The removal of debris from parks and recreational areas used by the public is eligible when it affects public health or safety or proper utilization of such facilities. Trees usually constitute a large part of the debris in these recreational areas. Normally trees requiring removal are flush-cut at the ground. Stump removal is not eligible unless the tree has been uprooted.

#### 4. *Debris Removal from Private Property*

Debris removal from private property is the responsibility of the individual property owner. FEMA assistance is not available to reimburse private property owners for the cost of removing debris from their property. If property owners move the disaster-related debris to a public right-of-way, local or state government may be reimbursed for pickup and disposal for a limited period of time. If debris on residential property and private businesses is so widespread that public health, safety or economic recovery of the community is threatened, debris removal from private property may be eligible. However, this must be approved ahead of time by the Disaster Recovery Manager.

#### 5. *Reasonable Costs Debris Removal*

- The FEMA definition of “reasonable” is a cost that is both fair and equitable for the type of work being performed. The reasonable cost requirement applies to all labor, materials, equipment, and contract costs awarded for the performance of the eligible work. To accomplish effective debris clearance in the early stages of an

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### H. Public Assistance Program (Cont'd.)

#### 5. Reasonable Costs Debris Removal (Cont'd.)

emergency/disaster response, an applicant (local government) may decide if they will remove and dispose of debris using either force account or contract services.

**Force Account Labor** – The cost of straight time salaries and benefits of a City's permanently employed personnel are not eligible in calculating the cost of eligible emergency work. Overtime pay of a permanent employee used for a disaster is eligible. Temporary employees hired as a direct result of a disaster are eligible for both regular and overtime pay.

- **Force Account Equipment** – The costs of using applicant owned equipment while conducting eligible work may be claimed on the basis of accepted equipment rates (*see Appendix I*). Equipment rates generally include operation, insurance, depreciation and maintenance. Extraordinary expenses for repairs and maintenance that are required due to severe conditions in disaster operations may be eligible.
- **Mutual Aid Agreements** – Debris activities may be performed through Mutual Aid Agreements between local governments and volunteer organizations. Labor and equipment costs are subject to the same conditions of reasonableness as those of the applicant's workforce.
- **Contracts** – Costs of contractors used to accomplish emergency work are eligible for reimbursement. Costs of straight time force account labor overseeing contractors performing emergency debris clearance is not eligible.
- **Sources of Cost Data** – Costs for work to be performed should not be determined arbitrarily, there must be some basis for reasonableness. Costs may be determined by reviewing: historical data for similar work in locale or region, contract costs for similar work being done in the area, US Army Corps of Engineer costs in the area, State Office of Emergency Services data, and FEMA cost codes for force account work.
- **Factor Affecting Costs** – Available cost data may need to be adjusted to reflect the time frame and location of the operation. Each debris operation has unique aspects that affect the total costs, whether the work is performed by force account or contract. These factors include: travel distances and conditions, use of temporary staging areas, method of volume reduction, costs of hauling, and landfill tipping fees.
- **Salvaged Materials** – Debris generated by a disaster may have a market value. Any revenue generated from debris must be used to offset the project costs. Types of material that may generate a revenue includes: scrap metal, timber and mulch debris.