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[www.londonderrypa.org](http://www.londonderrypa.org)

## SI/SD ADMINISTRATIVE PROCEDURES FOR DEVELOPMENT IN THE SPECIAL FLOOD HAZARD AREA

### I. Purpose and Use

The purpose of this document is to establish and administer a systematic process for Londonderry Township to make Substantial Improvement/Substantial Damage (SI/SD) determinations. Communities that participate in the National Flood Insurance Program (NFIP) are required to adopt and enforce floodplain management regulations that include those requirements for SI/SD structures, as defined in 44 CFR 59.1.

Improvements to structures in the regulated floodplain that equal or exceed 50% of the market value, including improvements undertaken after being substantially damaged during a disaster, must be brought into compliance with current local floodplain management regulations and cannot be rebuilt to pre-damage conditions. Township officials must ensure that all permits issued for reconstruction must be in compliance with Township regulations.

This document provides a set of standard operating procedures in one accessible location so the community will be more fully informed and prepared when a disaster strikes. This systematic process includes plans, procedures, and processes for actions taken pre-disaster as well as immediately following a disaster event, and post-disaster closure.

This document serves as a blueprint to be used in both day-to-day SI/SD operations as well as all disaster events, to include all types of hazards (flooding, wind, fire, etc.), small and large events, and presidential-declared or non-declared events. This plan is based on a model provided and required by FEMA.

### II. Regulations related to Structures within an SFHA

SI/SD structures in Londonderry Township are defined and regulated within the framework of the following legislation. These shall be referenced to determine the definition of SI/SD and any legal requirements pertaining to post-disaster permitting:

- Chapter 27 Part 15 Floodplain Development Ordinance 2012-1 effective 7-17-2012
- Uniform Construction Code Building Codes:
  - ✓ UCC Chap 403 Ordinance 2004-3 Chapter 5 Part 8 Section 5-804 effective 7-6-2004
  - ✓ 2018 IBC: Appendix G effective 02-14-2022
  - ✓ 2018 IRC: R 322 effective 02-14-2022
  - ✓ 2018 International Codes Flood Provisions (fema.gov) effective 02-14-2022
- Londonderry Township Building Permit Requirements that may be found at [www.londonderrypa.org](http://www.londonderrypa.org) )

### III. Appeals/Variances

Londonderry Township's provisions that regulate the appeals process for development in the floodplain and/or SI/SD are regulated thru the Londonderry Township Ordinances. Due to Londonderry Township's adoption of floodplain provisions in the Zoning Ordinance as well as the Building Codes under the Uniform Construction Code there are two appeal boards for these regulations:

#### 1. Board of Appeals

- Zoning Hearing Board of Appeals- appeals based on the Londonderry Township Zoning Ordinance
  - More information may be found on the Londonderry Township web site at [www.londonderrypa.org](http://www.londonderrypa.org)
- Board of Building Appeals – appeals based on the flood provisions in the UCC Building Code
  - Capital Region Council of Governments [[CAPCOG](#)]

IV. Permit Process - for development in the SFHA (including SI) Londonderry Township has a systematic process for development including existing structures that must be assessed for substantial improvement.

The process is:

1. All development in a designated SFHA requires a floodplain development permit, a building permit and a zoning permit that may be found on line at [www.londonderrypa.org](http://www.londonderrypa.org)
2. Londonderry Township's Floodplain Administrator will coordinate the review all permit applications to determine if the work constitutes a Substantial Improvement.
  - A Substantial Improvement Worksheet shall be completed by the applicant for any building in the floodplain / floodway making improvements.
  - If it is determined that the improvement on the structure exceeds the value of the structure by 50% will be deemed bit will be deemed substantially improved and must comply with all current floodplain regulations set forth in the Zoning Ordinance Part 15 and Building Codes.
    - o Floodplain Administrator will issue a Notice of Determination to the applicant
    - o Applicants will need to resubmit construction plans that meet the current floodplain regulations for a substantial improvement found in the Zoning Ordinance Part 15 and Building Codes.
    - o If the applicant needs additional information or would like to contest the market value (tax value) or improvement value (cost per square foot) they may schedule a meeting with the Floodplain Administrator and/or submit the information following the policy above.
  - If it is determined that the improvement of the structure does NOT exceed the value of the structure by 50% it will be deemed non-substantially improved. The proposed work can proceed as proposed and a permit will be issued. However, if the scope, materials, budget or any project change orders are issued then a new or revised permit application must be submitted.
3. Flood provisions in the IRC and IBC shall be reviewed for compliance to the permit regulations and may be found on line at [www.londonderrypa.org](http://www.londonderrypa.org)

#### V. Method for Determining Market Value of Structures

Londonderry Township has a methodology for determining the market value of substantially improved structures. The primary method used for determining market value of substantially improved structures is:

- Township will use as the rebuttably presumed market value of the structure the most recent real estate valuation for the property (excluding land valuation) based on the Dauphin County, Pennsylvania tax assessment records as adjusted by the Pennsylvania State Tax Equalization Board common level ratio factor for Dauphin County in effect for the real estate tax year as of the date of the application:
  - o Web Links
    - Dauphin County Property & Taxes <http://www.dauphinpropertyinfo.org/>
    - PA Department of Revenue [Common Level Ratio](#)
- To rebut the presumption of value based tax assessment, the owner can procure and submit to the Township their own appraisal of the market value of the structure by an appraiser duly licensed in Pennsylvania:
  - o Must be within the last 12 months
  - o Appraisal reports should include the following: See section 4.5.1 Professional Property Appraisals of the Substantial Improvement/Substantial Damage Desk Reference (fema.gov): [SI/SD Desk reference](#)
    - o Intended users, including the property owner, who can then submit it as part of a permit application.
    - o Must reflect the value of the property before any renovation or alterations
    - o Separate the market value of a structure from the value of the land

## VI. Method for Determining Cost of Improvement for Structures within an SFHA

Londonderry Township has a methodology for determining the cost of improvement of structures.

The primary method used for estimating cost of improvement is:

- Itemized cost estimates from a licensed contractor, design professional or professional cost estimator.
  - Itemized costs estimates submitted from any of the above professional must be accompanied by a “Contractor Affidavit” form.
- Cost estimates shall include an itemized list of the items found in section 4-4 of the Substantial Improvement/Substantial Damage Desk Reference(fema.gov): [SI/SD Desk reference](#)
  - For determination analysis, the value placed on all donated or discounted materials shall be equal to the actual or estimated cost of such materials and must be included in the total cost.
  - Where materials or equipment are donated or discounted below normal market values, the value should be adjusted to an amount that would be equivalent to that estimated through normal market transactions.
  - In situations involving volunteer labor or where the owner undertakes the work on their own, the normal market value or going rate for labor must be included in the estimates. The value placed on labor shall be estimated based on applicable minimum hour wage scales for the skill and type of construction work to be completed.
  - Itemized estimates must be signed by a licensed professional attesting that the information provided is accurate.
  - For purposes of SI, Electric and Plumbing work must be included in the cost of improvement. The permit applications may be found on the Londonderry Township web site at [www.londonderry.org](http://www.londonderry.org)
- Itemized cost estimates from a building owner
  - Itemized cost estimates submitted by the building owner must be accompanied by a “Property Owner Affidavit” form
  - Cost estimates shall include an itemized list of the items found in section 4-4 of the Substantial Improvement/Substantial Damage Desk Reference(fema.gov): [SI/SD Desk reference](#)
    - Building owner(s) may submit cost estimates that they prepare themselves provided supporting documentation such as pricing information from lumber companies and hardware stores, as well as the market value of labor including the owner’s labor, are submitted to the Township.
    - The Floodplain Administrator has the discretion to use the most recently published International Code Council –[Building Valuation Data](#) (iccsafe.org) to determine a value of work based on building types and square footage impacted by proposed work in cases of disagreement or when homeowners do their own work.
- Phased work and/or multiple permits
  - Multiple Permits: The applicant must provide the combined value of all the proposed work to make a substantial improvement/damage determination, regardless of the number of permits issued.
  - Phased Improvements: The term “phased improvement” refers to a single improvement that is broken into parts. For a number of reasons, an applicant may wish to schedule anticipated improvements over a period of time, and they may request separate permits for each phase. The floodplain administrator has the discretion to ensure that phased improvements do not circumvent the substantial improvement requirements. Permits issued in the previous 12 months will be considered by the Floodplain Administrator to determine SI.
- Section 4.4.8 of the [SI/SD Desk Reference](#) provides for an exclusion for any project for improvement of a structure to correct existing violations of State or local health, sanitary or safety code specifications which have been identified by the local code enforcement official and which are the minimum necessary to assure safe living conditions

## VII. Method for Determining Cost of Damage/Repair for Structures within an SFHA

Londonderry Township has a methodology for determining the cost of damage/repair of structures. The primary method used for estimating cost of damage / repair is:

- Londonderry Township will first use the Preliminary Damage Assessment “destroyed” category, which is defined as the: *“waterline at the roofline or higher or complete failure of two or more major structural components (e.g., collapse of basement walls, foundation, walls, or roof)”* [FEMA PDA Pocket Guide 08/2021], to determine structures are **substantially damaged**.
- For properties not deemed “destroyed” the Township will use most recently published International Code Council — [Building Valuation Data](#) – ICC (iccsafe.org) to determine a value of **repair** based on building types and square footage of damage.
- An owner wishing to appeal the value of repairs based on the ICC Building Valuation Data may provide an itemized cost estimate from a licensed contractor, design professional or professional cost estimator based on the following:
  - Cost estimate shall include an itemized list of the items found in section 4-4 of the Substantial Improvement/Substantial Damage Desk Reference(fema.gov): [SI/SD Desk reference](#)
    - For determination analysis, the value placed on all donated or discounted materials shall be equal to the actual or estimated market value of such materials and must be included in the total cost.
    - Where materials or servicing equipment are donated or discounted below normal market values, the value should be adjusted to an amount based upon normal market transactions.
    - In situations involving volunteer labor the normal market value or going rate for labor must be included in the estimates. The value placed on labor shall be estimated based on applicable market value wage scales for the skill and type of construction work to be completed.
    - Itemized estimate must be signed by licensed professional attesting that the information provided is accurate.
  - Owner prepared cost estimates may be submitted provided supporting documentation such as pricing information from lumber companies and hardware stores, including actual or estimated fair market prices for donated or discounted materials as well as the market value of any volunteer labor including the owner’s labor based on applicable market value wage scales for the skill and type of construction work to be completed are submitted to the Township along with a “Property Owner Affidavit” form.
  - The Floodplain Administrator has the discretion to use the most recently published International Code Council – [Building Valuation Data](#) (iccsafe.org) to determine a value of work based on building types and square footage impacted by proposed work in cases of disagreement or when homeowners do their own work.

## VIII. Emergency Coordination

### 1- Overview of Emergency Response Coordination

Pennsylvania's government structure is a Commonwealth; wherein authority and *responsibility* for Emergency Management (and police, fire, and EMS response) resides at the Township level in accordance with PA Title 35 Chapter 75 section § 7501. Londonderry Township has a designated Emergency Management Agency Coordinator who has authority and responsibility for the planning, administration and operation of the Emergency Operations Center subject to the direction and control of the governing body.

When a disaster strikes there are many damage assessments that occur by a variety of federal, State, local, and other organizations to determine response and recovery needs. (Substantial Damage (SD) inspections are required thru locally adopted regulations, usually found in the building codes, that require the Floodplain Administrator to make a determination of whether or not a structure is damaged more than 50% of its market value). SD inspections are required for all structures located within the Special Flood Hazard Area (SFHA) and occur when any damage happens such as flood, wind, tornado, earthquake, tree, vehicle, fire, etc.

### 2-Key functions and responsibilities for conducting a Substantial Damage Determination review.

Identify impact area(s)	<i>Emergency Manager / Codes Office</i>
Coordinate with including fire, police and other emergency services	<i>Emergency Manager / Codes Office</i>
Communicate with Public	<i>Emergency Manager / Township Manager</i>
Conduct preliminary damage assessments	<i>Codes Office / Floodplain Administrator</i>
Coordinate SD inspections	<i>Emergency Manager / Township Manager</i>
Make SD Determinations	<i>SDE Engineer / Floodplain Administrator</i>
Issue Determination Letters	<i>Floodplain Administrator</i>
Maintain SD Admin Procedure	<i>Floodplain Administrator</i>
Organize Staff Training	<i>Floodplain Administrator</i>
Issue repair/rebuild permits	<i>BCO / Codes Office</i>
Manage appeals	<i>BCO / Codes Office</i>
Manage and Maintain SD Data	<i>Floodplain Administrator / Codes Office</i>
Record Costs & SD activities	<i>Floodplain Administrator / Codes Office</i>

### 3. Post Disaster Review

A process for determining the post-disaster impact is outlined below:

- For flood damage:

Londonderry Township will identify where flood damage has occurred throughout the Township's identified SFHA. There may be a variety of distinct post-disaster reviews, assessments and inspections other than SD that must be evaluated and coordinated where necessary.

Emergency Management Agency Coordinator will organize Preliminary Disaster Assessment (PDA's) reviews for both the mainland as well as the islands for the purposes of a disaster declaration . Londonderry Township river rescue team will be deployed to provide transportation to the islands. These PDA's are not substantial damage determinations but shall be used by the EMAC to identify damaged areas for additional field reviews.

- Other sources:

Department of Public Works staff will report damage to the EMAC  
Monitor local news reports and National Weather Service  
FEMA and PEMA updates

- For fire damage:  
The Township Fire Departments respond, and applicants seek permits to rebuild
- For other damage, not limited to wind, vehicles, trees, etc., the Building Code Official (BCO) will be notified through the permit application process.

#### 4. Training / Resources

Londonderry Township adheres to the following regulations that govern training / certification requirements for Emergency Management personnel and utilizes the practices and guidance noted below:

##### A. Training/certification of Emergency Management Coordinator

- § 7502 requires the local EMC to be professionally competent & capable, and to attend & successfully complete a training program established by PEMA.
- § 7502 also requires the level of government above to provide at minimum, quarterly, professional in-service training for the designated Londonderry Township Emergency Management Agency Coordinator.  
Dauphin County also provides monthly in-service training available to all local EMACs, duly enrolled volunteers, and emergency response personnel. Topics include how to Prevent, Protect, Mitigate, Respond, and Recover from disasters. Quarterly discussion-based exercises are made available to all municipalities including Londonderry Township, as well as one Functional Exercise every other year.
- § 7502 - [LINK](#)
- D2022-02 - [LINK](#)

B. Providing pre/post-disaster training ensures that staff know what to do after an event. Applicable training has been and continues to be made available thru PEMA and FEMA, and include, but are not limited to Independent Study as well as use of the following FEMA Technical Bulletins, and Publications located within the Township reference library:

##### FEMA Technical Bulletins / Publications:

Bulletin 01-20 / March 2020 Requirements for Flood Openings in Foundation Walls and Walls of Enclosure

[https://www.fema.gov/sites/default/files/2020-07/fema\\_tb1\\_openings\\_foundation\\_walls\\_walls\\_of\\_enclosures\\_031320.pdf](https://www.fema.gov/sites/default/files/2020-07/fema_tb1_openings_foundation_walls_walls_of_enclosures_031320.pdf)

Bulletin 02-08 / August 2008 Flood Damage Resistant Materials Requirements

[https://www.fema.gov/sites/default/files/2020-07/fema\\_tb\\_2\\_flood\\_damage-resistant\\_materials\\_requirements.pdf](https://www.fema.gov/sites/default/files/2020-07/fema_tb_2_flood_damage-resistant_materials_requirements.pdf)

Bulletin 03-21 / January 2021 Requirements for the Design and Certification of Dry Floodproofed Non-Residential and Mixed Use Buildings

[https://www.fema.gov/sites/default/files/documents/fema\\_technical-bulletin-3\\_1-2021.pdf](https://www.fema.gov/sites/default/files/documents/fema_technical-bulletin-3_1-2021.pdf)

Bulletin 05-20 / March 2020 Free of Obstruction Requirements

[https://www.fema.gov/sites/default/files/2020-07/fema\\_tb5\\_free\\_obstruction\\_requirements.pdf](https://www.fema.gov/sites/default/files/2020-07/fema_tb5_free_obstruction_requirements.pdf)

Bulletin 06-21 / January 2021 Requirements for Dry Floodproofed Below Grade Parking Under Non-Residential and Mixed Use Buildings

Bulletin 07-93 / December 1993 / Wet Floodproofing Requirements

Bulletin 11-01 / November 2001 / Crawlspace Construction

FEMA P-936 / Floodproofing Non-Residential Buildings

FEMA P-85 / Protecting Manufactured Homes from Flood and Other Hazards

FEMA E-273 Managing Floodplain Development Through The National Flood Insurance Program

FEMA P-480 Floodplain Management Requirements

FEMA P-234 Repairing Your Flooded Home October 2010

[https://nchh.org/resource-library/fema\\_repairing-your-flooded-home.pdf](https://nchh.org/resource-library/fema_repairing-your-flooded-home.pdf)

IS-284: Using the SDE Tool;

IS-285: SDE for Floodplain Administrators;



E/L/G 285: Providing Post-Disaster SD Technical Assistance to Communities.

Information on classroom and field courses offered by FEMA can be found here:  
FEMA - Emergency Management Institute (EMI).

C. The Londonderry Township staff training also includes the following areas:

- Londonderry Township Hazard Mitigation Plan
- Londonderry Township Emergency Response Plan
- FEMA P-758 SI/SD Desk Reference: Substantial Improvement/Substantial Damage Desk Reference (fema.gov)
- Londonderry Township SI/SD Administrative Procedures

## 5. Emergency Operations Planning

- A. Title 35 requires each municipality and County to prepare, maintain and keep a current Emergency Operations Plan for the prevention of injury & damage caused by disaster that includes directives and provides details for the implementation of that plan. PEMA Directive D2018-01 specifies implementation of the planning requirements, and requires Municipalities to establish & update their Emergency Operations Plan a minimum of every 2 years; or adopt the County's EOP by resolution. Londonderry Township has adopted by resolution the Dauphin County Emergency Operations Plan.
- B. Municipalities are required to establish & update Emergency Response Checklists a minimum of every 2 years. The checklists supplement the EOP by establishing a detailed list of emergency response actions to be performed by elected officials, EMCs, and other Emergency Response Personnel. Londonderry Township has in place an Emergency Response Checklist.
- C. Municipalities must establish and update their Notification & Resource Manuals (NARM) annually. NARMs supplement the EOP as well by providing contact information for those who need to be notified during an emergency (both within government, and citizens with Access & Functional Needs), and containing a comprehensive list of emergency response personnel, equipment, supplies, and other resources which can be mobilized & used during an actual or potential disaster emergency. Londonderry Township has in place a Notification & Resource Manuals (NARM).
- § 7503 – [LINK](#)
  - PEMA Directive D2018-01- [LINK](#)
  - County Emergency Operations Plan - [LINK](#)

## 6. Damage Assessment – to include all residences in the county, including Repetitive Loss and Severe Repetitive Loss properties

- A. [PEMA Damage Assessment](#) process found in Title 35 Part V Section § 7503 and PEMA Directive D2017-03 describes the preliminary damage assessment procedures to be initiated by the Emergency Management Coordinator designed to collect preliminary damage information within five basic categories: destroyed; major; minor; affected and inaccessible. For structures listed as major and minor additional analysis is completed utilizing the [Substantial Damage Estimator Tool](#). in conjunction with standalone tools developed by the Township.

In support of this effort, [Dauphin County ArcGIS](#) based system is used for Damage Assessment, and dedicates 2 monthly training sessions annually to in service training. The ArcGIS system provides for Windshield Surveys & Initial Damage Reporting of facilities and is a system based upon FEMA templates linked with tax parcel data to provide for damage cost estimations.

Londonderry Township EMAC participates in these trainings, has access to the system, and has exercised this capability.

- Directive 2017-03 -[LINK](#)

## 7. Hazard Mitigation Planning

- A. Authority and requirements originate from the following Commonwealth of Pennsylvania sources:
- Pennsylvania Emergency Management Services Code. Title 35, Pa C.S. Section 101.
  - Pennsylvania Municipalities Planning Code of 1968, Act 247 as reenacted and amended by Act 170 of 1988.
  - Commonwealth of Pennsylvania 2023 State Hazard Mitigation Plan

B. Dauphin County maintains & updates the countywide Hazard Mitigation Plan, including 40 municipalities and certain Private Non-Profits. Londonderry Township avidly participates in this process through the Planning Committee and by adopting the plan via municipal resolution, and has done so since the inception of the program.

C. Hazard Mitigation Plan - [LINK](#)

The Hazard Mitigation mapper provides public outreach regarding flooding and other hazards of concern within Dauphin County. Anyone can access the webpage, type in an address they are curious about and learn about the flood hazard to that specific location.

This includes potential flooding sources such as dam breaches. We will be adding stormwater flooding considerations through a partnership with Tri County in 2025.

o Hazard Mitigation Mapper [LINK](#)

## 8. Public Outreach

Londonderry Township has a strategy and associated products for immediate post-disaster public communications. Having these documents prepared prior to an event will avoid confusion and stress immediately following an event.

- Londonderry Township Webpage
- Social Media Post

The following communications methods are used for immediate post-disaster communication to the public:

- County hall meetings
- Community website
- Social media (Facebook)
- Public Service Announcements (PSAs) on radio
- Handouts, newsletters, brochures, mailers, info kiosks available to residents

## 9. Inspections

Londonderry Township's inspections are scheduled to be will be conducted bi-annually by Township Building Code/Inspection staff to inspect damaged properties and collect SD data. If needed the Township will enter into a contract with its 3rd party engineer to assist in SD inspections. Inspections will be documented on a SD Worksheet In some cases, Township Emergency Management Staff will have provided the Floodplain Administrator its preliminary disaster assessment (PDA) information, which will be categorized by:

- Affected – property damage due to floods (no flood waters in structure)
- Minor - less than 18” of water on lowest living floor (below receptacles)
- Major - more than 18” of water on lowest living floor (above receptacles)
- Destroyed – structures completely flooded up to ceiling, moved off foundation, not on site anymore.

For the purposes of SD determinations during a wide-scale event, the Township will deem any “destroyed” properties as SD. Inspectors shall prioritize any structure categorized as major and minor for SD inspections. But follow-up with other properties as time allows.

## 10. SD Determinations

After staff have conducted inspections and collected data, the Building Official will make SI/SD determinations, and document on the SD Worksheet. The methods above (Method to Determine Market Value and Method to Determine Value of Damage/Repair) will be used to determine the market value and value of damage/repair. On the worksheet, the Building Official will calculate the % damaged, and maintain a record in the property file.

## 11. Issuing Determinations

Communicating SI/SD determinations to affected property owners is required by Township regulations. Determinations are a necessary step to issuing permits for compliant rebuilding and are a requirement for administering a compliant floodplain management program in Londonderry Township.

In flood events SD Determinations are needed by property owners who maintain flood insurance through the NFIP and would like to access Increased Cost of Compliance (ICC) coverage. The Floodplain Administrator is responsible for issuing these determinations.



Londonderry Township’s procedure for communicating the results of the SI/SD determinations to structure owners. The following methods are utilized:

- Letter to structure owners/residents
- Paper handed directly to the structure owner/resident
- Post the determination at a physical place on the property
- Conduct field inspections to verify no work is conducted without a permit

Letter templates and documents used to notify residents of determinations can be found here:

- Notice of Substantial Damage
- Notice of Non-Substantial Damage

## 12. Appeals/Variances

Londonderry Township has a process and other supporting materials for receiving, reviewing, and making decisions on appeals or requesting variances. The process and materials can be found here:

1. If a property owner receives a notice of “Substantial Damage” or “Non-Substantial Damage” and disagrees with the market value and/or damage/repair value, you can contact the floodplain administrator to discuss the submission of the following documentation:
  - o See above for appeal method for market value and value of damage/repair
  - o See above for appeal/variance

## 13. Permitting for Repairs and Rebuilding

Issuing permits is a regular part of floodplain management but is especially important following a disaster. Repairing and rebuilding substantially damaged structures in compliance with local regulations is critical to maintaining good standing in the NFIP and protecting structure owners from future disasters. Below are the Township’s permitting procedures during blue skies, applicable to substantial improvement projects, and post-disaster/ emergency permitting procedures.

NOTE:

To understand how to repair and rebuild structures (post disaster) within an SFHA refer to Part VIII subsection 3 FEMA Pub 234 and associated Technical Bulletins.

[https://nchh.org/resource-library/fema\\_repairing-your-flooded-home.pdf](https://nchh.org/resource-library/fema_repairing-your-flooded-home.pdf)

Londonderry Township will conduct periodic inspections of damaged properties after a disaster to assure permits are being obtained for repair and rebuilding. In the case of properties deemed substantially damaged the Township will coordinate with utility companies to assure utilities are not restored until Township permits are obtained.

## 14. SD Data

Londonderry Township’s process for documenting and storing SD determination data will be maintained by the Floodplain Administrator.

## 15. Monitoring

Finally, once the Township returns to blue sky operations, it is important to reflect on what went well and what could be improved. Tracking best practices and evaluating things like response times, staff needs, and more can highlight opportunities to respond faster and stronger next time.

A process for (i.e., implementation plan) for evaluating and continuously improving these substantial damage administrative procedures shall be maintained by the Floodplain Administrator.

## 16. Record Costs and Track SD Activities (only applies to federally declared disasters)

Recording costs and tracking SD activities may be necessary to obtain resources or reimbursement for disaster response, such as through FEMA Public Assistance reimbursement for activities made eligible by DRRA Section 1206 or other grants and funding sources.

- DRRA Section 1206 funding defines a period of eligibility to be no longer than 180 days after the date of a major disaster declaration. FEMA does not have the authority to extend this deadline.

See Section A, Applicability, of the Building Code and Floodplain Management Administration and Enforcement Policy for more information.

To receive reimbursement, communities must submit all supporting documentation necessary to demonstrate the work completed and the location of the work; all documentation associated with work completed through Emergency Mutual Assistance Compact (EMAC) resource request or intrastate/interlocal mutual aid request; and, if

work was performed by contract labor, all documentation demonstrating federal procurement rules in 2 Code of Federal Regulations Part 200 were followed.

The SD Manager will be responsible for coordinating and submitting for reimbursement.

## Appendix

- Forms:
  - o SI Worksheet # 6c
  - o Homeowners Affidavit Agreement # 9b
  - o Contractors Affidavit Agreement # 10b
  
- Letters:
  - o Letter of SI # 5b
  - o Letter of Non-SD # 7b
  - o Letter of SD # 8b