

# Local Mitigation Plan Review Guide

October 1, 2011



**FEMA**



# TABLE OF CONTENTS

---

## MITIGATION PLAN REVIEW GUIDE

<b>SECTION 1: INTRODUCTION .....</b>	<b>1</b>
1.1 Purpose of Local Mitigation Plan Review Guide.....	1
1.2 Organization of Guide.....	2
1.3 Roles & Responsibilities .....	2
1.4 Mitigation Plan Updates .....	3
1.5 Flood and Multi-hazard Mitigation Plans .....	3
<b>SECTION 2: PLAN REVIEW GUIDING PRINCIPLES.....</b>	<b>5</b>
<b>SECTION 3: COMPLETING THE PLAN REVIEW TOOL .....</b>	<b>7</b>
3.1 Regulation Checklist.....	7
3.2 Plan Assessment .....	8
3.3 Multi-Jurisdiction Summary Spreadsheet.....	11
<b>SECTION 4: REGULATION CHECKLIST .....</b>	<b>13</b>
4.1 ELEMENT A: Planning Process.....	14
4.2 ELEMENT B: Hazard Identification and Risk Assessment .....	18
4.3 ELEMENT C: Mitigation Strategy .....	22
4.4 ELEMENT D: Plan Review, Evaluation, and Implementation .....	26
4.5 ELEMENT E: Plan Adoption .....	28
<b>SECTION 5: PLAN REVIEW PROCEDURE .....</b>	<b>31</b>
5.1 Communicating the Review .....	31
5.2 Mitigation Plan Submittal .....	32
5.3 Mitigation Plan Review .....	32
5.4 Mitigation Plan Approval and Adoption .....	34
<b>APPENDIX A: LOCAL MITIGATION PLAN REVIEW TOOL .....</b>	<b>A-1</b>
<b>SECTION 1: REGULATION CHECKLIST .....</b>	<b>A-2</b>
<b>SECTION 2: PLAN ASSESSMENT .....</b>	<b>A-5</b>
<b>SECTION 3: MULTI-JURISDICTION SUMMARY SPREADSHEET .....</b>	<b>A-9</b>



# SECTION 1: INTRODUCTION

---

## 1.1 PURPOSE OF LOCAL MITIGATION PLAN REVIEW GUIDE

The purpose of this *Local Mitigation Plan Review Guide* is to help Federal and State officials assess Local Mitigation Plans in a fair and consistent manner, and to ensure approved Local Mitigation Plans meet the requirements of the Stafford Act and Title 44 Code of Federal Regulations (CFR) §201.6.<sup>1</sup>

The target audience for this Guide is Federal and State officials that complete Local Mitigation Plan reviews. Plan *developers* are directed to the *Local Mitigation Planning Handbook*<sup>2</sup>. The *Local Mitigation Plan Review Guide* (or *Plan Review Guide*) and the *Local Mitigation Planning Handbook* (or *Planning Handbook*) may be used in tandem by plan reviewers and developers so that communities understand the technical requirements, as well as understand the various ways that plans can be developed to meet these requirements. FEMA supports, coordinates and reviews local plans as a means to:

- Foster federal, state, and local partnerships for hazard mitigation;
- Promote more resilient and sustainable communities; and
- Reduce the costs associated with disaster response and recovery by promoting hazard mitigation activities.

This *Local Mitigation Plan Review Guide*, as interpretation and explanation for the Mitigation Planning regulation in 44 CFR Part 201, is the Federal Emergency Management Agency's (FEMA) official source for defining the requirements of original and updated Local Mitigation Plans. The *Guide* represents FEMA's interpretation of a statutory or regulatory requirement. By itself, the *Guide* does not impose legally enforceable rights and obligations, but sets forth a standard operating procedure or agency practice that FEMA employees follow to be consistent, fair, and equitable in the implementation of the agency's authorities. The Guide includes references to specific language in 44 CFR §201.6 and descriptions of the relevant requirement to meet the Mitigation Planning regulation.

---

<sup>1</sup> Section 322 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended, 42 U.S.C. 5165, and the National Flood Insurance Act of 1968, as amended, 42 U.S.C. 4001 et seq., 44 Code of Federal Regulations (CFR) Part 201.

<sup>2</sup> The *Local Mitigation Planning Handbook* is under development; once issued, the *Plan Review Guide* and *Planning Handbook* will supersede the *Local Multi-Hazard Mitigation Planning Guidance* (also known as the "Blue Book").

## 1.2 ORGANIZATION OF GUIDE

This *Plan Review Guide* has six sections:

- Section 1: Introduction
- Section 2: Plan Review Guiding Principles
- Section 3: Completing the Plan Review Tool
- Section 4: Regulation Checklist
- Section 5: Plan Review Procedure
- Appendix A: Plan Review Tool

Section 1 describes the purpose and organization of the *Plan Review Guide*. Section 2 describes the overall guiding principles for Local Mitigation Plan reviews. Section 3 provides instructions on how FEMA will complete the *Local Mitigation Plan Review Tool*, including the Regulatory Checklist and Plan Assessment. Section 4 provides the detailed guidance on how FEMA interprets the regulation through the Regulatory Checklist for all Local Mitigation Plan reviews. Section 5 describes the Plan Review Procedure from submittal through approval, including methods of communication between FEMA, States and local governments that develop Local Mitigation Plans. Finally, Appendix A includes the *Plan Review Tool* to document the evaluation of any Local Mitigation Plan.

## 1.3 ROLES & RESPONSIBILITIES

The primary audience for this *Plan Review Guide* is Federal and State officials or staff that complete reviews of Local Mitigation Plans developed to meet FEMA's Mitigation Planning requirement under 44 CFR Part 201. The requirement for plan reviews (44 CFR 201.6(d)(1)), reads:

*Plans must be submitted to the State Hazard Mitigation Officer (SHMO) for initial review and coordination. The State will then send the plan to the appropriate FEMA Regional Office for formal review and approval. Where the State point of contact for the FMA program is different from the SHMO, the SHMO will be responsible for coordinating the local plan reviews between the FMA point of contact and FEMA.*

The State is responsible for the initial review and coordination of the plan between the local government and FEMA. Additional information on the roles of the State official completing the plan review is described in Section 5, *Plan Review Procedure*.

FEMA is responsible for the final review and approval of all Local Mitigation Plans. Once a Local Mitigation Plan is submitted by the State, FEMA is responsible for the overall coordination of plan review, revisions, tracking and approval.

#### **1.4 MITIGATION PLAN UPDATES**

Local Mitigation Plans must be updated at least once every five years in order to continue to be eligible for FEMA hazard mitigation project grant funding. Specifically, the regulation at 44 CFR §201.6(d)(3) reads:

*A local jurisdiction must review and revise its plan to reflect changes in development, progress in local mitigation efforts, and changes in priorities, and resubmit it for approval within five (5) years in order to continue to be eligible for mitigation project grant funding.*

The *Local Mitigation Plan Review Guide* addresses plan updates within each required Element, and more specifically in Element D, Plan Updates. First, each required Element for Local Mitigation Plans must be met with *current* information. For example, the planning process and public participation that were completed in the previous planning cycle will not meet the requirements for the planning process in the five-year update. Likewise, if the plan update does not include major disaster declarations that occurred since the previous plan was written, FEMA will not approve the plan update. Although several sub-elements (A1, B2 and C6) have explicit guidance for plan updates, all sub-elements must be met with current information for FEMA approval of a plan update. Second, Element D identifies the plan update requirements to “*reflect changes in development, progress in local mitigation efforts, and changes in priorities*” (44 CFR §201.6(d)(3)). Specific guidance on how to meet each of these requirements is included in Element D, Plan Updates.

#### **1.5 FLOOD AND MULTI-HAZARDS MITIGATION PLANS**

Some communities choose to develop Local Mitigation Plans that only address flood hazards. In order to receive FEMA approval, flood mitigation plans must meet all Elements identified in the regulation at 44 CFR §201.6 and in the Regulation Checklist for flood hazards. FEMA and State officials that review and approve a flood-only mitigation plan will clearly inform the community that the community’s eligibility is limited to the flood mitigation programs authorized by the National Flood Insurance Act of 1968, as amended, and that the community will not be eligible for other FEMA assistance programs, such as Pre-Disaster Mitigation (PDM) and Hazard Mitigation Grant Program (HMGP), that require a multi-hazard mitigation plan.





## SECTION 2:

# PLAN REVIEW GUIDING PRINCIPLES

---

The purpose of hazard mitigation is to reduce potential losses from future disasters. The intent of mitigation planning, therefore, is to maintain a process that leads to hazard mitigation actions. Mitigation plans identify the natural hazards that impact communities, identify actions to reduce losses from those hazards, and establish a coordinated process to implement the plan. (44 CFR §201.1(b))

**Hazard mitigation** is any sustained action taken to reduce or eliminate the long-term risk to human life and property from hazards (44 CFR 201.2). Hazard mitigation activities may be implemented prior to, during, or after an event. However, it has been demonstrated that hazard mitigation is most effective when based on an inclusive, comprehensive, long-term plan that is developed before a disaster occurs.

In 2004, FEMA published mitigation planning guidance with a ‘performance’ based approach, rather than a ‘prescriptive’ approach. This means that the requirements identify, generally, *what* should be done in the process and documented in the plan, rather than specify exactly *how* it should be done. This performance approach continues along with a set of Guiding Principles to assist with the review of all Local Mitigation Plans. This *Local Mitigation Plan Review Guide* also includes a description of the intent specific to each requirement.

The following Guiding Principles will be applied to all plan reviews:

- 1. Focus on Mitigation Strategy.** *Plan reviews will emphasize actions and implementation of the hazard mitigation strategy.* All other sections of the plan contribute to and result in the hazard mitigation strategy and specific hazard mitigation actions. For example, a sound hazard identification and risk assessment is an important part of the plan, but is the basis, in part, for the strategy which is the focus of the Local Mitigation Plan. Submission of a Local Mitigation Plan for FEMA review and approval is not the end state, but is the beginning of implementing hazard mitigation action.
- 2. Review for Intent, as well as Compliance.** *Plan reviews will focus on whether the mitigation plan meets the intent of the law and regulation.* FEMA considers the overall plan and each Element (*for example*, planning process, risk assessment, mitigation strategy), as well as the individual requirements. A comprehensive review of the plan assists FEMA to validate that the plan meets the overall intent of mitigation planning, whereas only a strict interpretation of individual requirements may cause unnecessary revisions.

- 3. Process is as important as the Plan itself.** *FEMA will accept the planning process as defined by the community.* In hazard mitigation planning, as with most other planning efforts, the actual process of planning is as important as the plan itself. Said another way, the plan is only as good as the planning process that people chose to develop it. Bringing together local officials, stakeholders and the public in a community-driven planning process to develop the plan also helps build the community's overall hazard mitigation program. Therefore, FEMA considers the plan as the written record, or documentation, of the planning process. This is why some of the plan requirements ask for a "discussion" or "description" of generally, **what** must be documented in the plan, rather than specify exactly **how** it must be done.
- 4. This is the Community's Plan.** *Plan reviews will recognize the effort and interest of each community that develops a mitigation plan.* To emphasize the importance of the community's ownership of the plan, FEMA will recognize the inherent differences that exist among local governments with respect to size, resources, capability, and vulnerability. FEMA will not penalize communities that have less capability or demonstrate little progress in hazard mitigation efforts over time. In addition, FEMA will not require specific formats (*for example*, stand-alone plan, chapter in emergency operations plan, or integrated into comprehensive plan), and FEMA will not require information above or beyond the requirements to be removed (*for example*, non-natural, climate change). In fact, FEMA acknowledges that some plans will simply "pass" the minimum plan requirements to receive FEMA approval. However, communities of any size, resources or capability that demonstrate a genuine interest in and commitment to hazard mitigation through their planning process will be better positioned to receive FEMA technical and financial assistance to implement their actions or projects.
- 5. Foster Relationships.** *FEMA's relationship with the State and community is as important as the words in the plan.* Although the plan review is a necessary step for FEMA approval, FEMA's role is to provide technical assistance, not to be gatekeepers of plan approval. FEMA will work with States to ensure the plan review is communicated clearly and in a timely manner. FEMA will communicate the requirement through constructive and positive feedback, particularly if clarification or additional documentation is needed. FEMA understands that there is a whole planning process that has already happened, and FEMA's review of the plan is intended to benefit the community's hazard mitigation program.

## SECTION 3: COMPLETING THE PLAN REVIEW TOOL

---

The *Local Mitigation Plan Review Tool* (See Appendix A) demonstrates how the Local Mitigation Plan meets the regulation in 44 CFR §201.6 and offers States and FEMA Mitigation Planners an opportunity to provide feedback to the community.

- The Regulation Checklist provides a summary of FEMA’s evaluation of whether the Plan has addressed all requirements.
- The Plan Assessment identifies the plan’s strengths as well as documents areas for future improvement.
- The Multi-jurisdiction Summary Sheet is an optional worksheet that can be used to document how each jurisdiction met the requirements of the each Element of the Plan (Planning Process; Hazard Identification and Risk Assessment; Mitigation Strategy; Plan Review, Evaluation, and Implementation; and Plan Adoption).

The FEMA Mitigation Planner must reference this *Local Mitigation Plan Review Guide* when completing the *Local Mitigation Plan Review Tool*.

### **3.1 REGULATION CHECKLIST (*Completion by FEMA required*)**

The purpose of the Checklist is to identify the location of relevant or applicable content in the Plan by Element/sub-element and to determine if each requirement has been ‘Met’ or ‘Not Met.’ The ‘Required Revisions’ summary at the bottom of each Element must be completed by FEMA to provide a clear explanation of the revisions that are required for plan approval. Required revisions must be explained for each plan sub-element that is ‘Not Met.’ Sub-elements should be referenced in each summary by using the appropriate numbers (A1, B3, etc.), where applicable. Requirements for each Element and sub-element are described in detail in this *Plan Review Guide* in Section 4, Regulation Checklist.

### **3.2 PLAN ASSESSMENT (*Completion by FEMA Required*)**

The purpose of the Plan Assessment is to offer the local community more comprehensive feedback on the quality and utility of the plan in a narrative format. The audience for the Plan Assessment is not only the plan developer/local community planner, but also elected officials, local departments and agencies, and others involved in implementing the Local Mitigation Plan. The Plan Assessment must be completed by FEMA and is not required from the State. The Plan Assessment is an opportunity for FEMA to provide feedback and information to the community on: 1) suggested improvements to the Plan; 2) specific sections in the Plan where the community has gone above and beyond minimum requirements; 3) recommendations for plan implementation; and 4) ongoing partnership(s) and information on other FEMA programs, specifically RiskMAP and Hazard Mitigation Assistance programs.

The Plan Assessment is divided into two sections:

- A. Plan Strengths and Opportunities for Improvement
- B. Resources for Implementing Your Approved Plan

***Plan Strengths and Opportunities for Improvement*** is organized according to the plan Elements listed in the Regulation Checklist. Each Element includes a series of italicized bulleted items that are suggested topics for consideration while evaluating plans, but it is not intended to be a comprehensive list. FEMA Mitigation Planners are not required to answer each bullet item, and should use them as a guide to paraphrase their own written assessment (2-3 sentences) of each Element.

The Plan Assessment must not reiterate the required revisions from the Regulation Checklist or be regulatory in nature, and should be open-ended to provide the community with suggestions for improvements or recommended revisions. The recommended revisions are suggestions for improvement and are not required to be made for the Plan to meet Federal regulatory requirements. The italicized text should be deleted once FEMA has added comments regarding strengths of the plan and potential improvements for future plan revisions. It is recommended that the Plan Assessment be a short synopsis of the overall strengths and weaknesses of the Plan (no longer than two pages), rather than a complete recap section by section.

***Resources for Implementing Your Approved Plan*** provides a place for FEMA to offer information, data sources and general suggestions on the overall plan implementation and maintenance process. Information on other possible sources of assistance including, but not limited to, existing publications, grant funding or training opportunities, can be provided. States may add state and local resources, if available.

### ***Sample Completed Plan Assessment***

#### **I. Plan Strengths and Opportunities for Improvement**

##### **Element A: Planning Process**

###### ***Plan strengths***

- Public involvement process, as described in the planning process section, comprised of meetings with homeowners associations and public representation on various county boards and councils. A letter included in the Plan also indicates that the Plan was placed in public libraries along with preparedness and other hazard notices; and that comments were received and incorporated.

## ***Sample Completed Plan Assessment (continued)***

### ***Opportunities for improvement:***

- Consider providing more detail on the planning process. For example, list every meeting conducted and agencies represented at these meetings.
- Provide a list of comments received from all stakeholders, including the public. This information will provide specific direction for the next plan update.
- Consider providing additional information on outreach methods, etc., for additional Community Rating System (CRS) credit. Contact the State CRS coordinator at 234-234-2345 for more information.
- For the next plan update, consider gaining participation from the local media to help increase public awareness and participation. Posting documents on the web will also allow for more citizens to participate.

### **Element B: Hazard Identification and Risk Assessment**

#### ***Plan strengths:***

- Table 4.1 is an excellent presentation of the actions for each participating jurisdiction and identifies the responsible party, timeframe, hazard, possible funding source, priority, implementation schedule, and impediments to implementation.
- The Plan adequately identifies geographic information system (GIS) data gaps to improve the impact analysis and contains an associated action to acquire additional data for seismic landslide maps.
- The Plan does a good job of describing general development trends. Countywide trends are well described, and some attempt is made to describe trends within each incorporated jurisdiction. The reliance on 1990 and 2000 Census data to highlight these changes is effective in communicating long term trends, but more current data from the 2010 Census, local information, or other sources may bring further clarity to the Plan. Additionally, it may be useful to expand the discussion of development trends to include other agencies that may be represented in the Plan (*for example*, school districts and special districts) since changes in development may greatly impact the vulnerability for these jurisdictions.

#### ***Opportunities for improvement:***

- Potential dollar losses are not addressed in this version and would be a good addition to the next update. The methodology on how loss estimates are prepared should also be included.
- The maps presented within the Plan provide an excellent perspective on vulnerability for various jurisdictions, but more detail concerning these efforts to analyze hazards through advanced GIS methods would be useful. For instance, it is evident that spatial analysis was conducted to determine if there were dams located in close proximity to structures owned by jurisdictions, but no information concerning the buffer distance (or definition of “close”) is included for this analysis.

### **Element C: Mitigation Strategy**

#### ***Plan strengths:***

- The Plan contains excellent information on funding sources and resources for implementing mitigation actions. It may also be useful to include contact information for the State Hazard Mitigation Officer and the State Mitigation Management website location among these resources since the State is responsible for coordinating the implementation of many of these programs within the State.

### ***Sample Completed Plan Assessment (continued)***

#### ***Opportunities for improvement:***

- Some linkages between the mitigation strategy and Hazard Identification and Risk Assessment are evident, but could be better explained in future Plan Updates. As more refined information is created for certain hazards (such as dam failure) it may be possible to target mitigation actions more specifically at certain hazard areas likely to be vulnerable to these hazards.
- The Plan does a good job of identifying other resources such as U.S. Department of Agriculture (USDA) and Community Development Block Grant (CDBG) programs that may be useful for mitigation. Linking these programs to mitigation actions could increase the effectiveness of the Plan and make it a more valuable resource for community officials and citizens.

#### **Element D: Plan Update, Evaluation, and Implementation (applicable to plan updates only)**

##### ***Plan strengths:***

- The XXX County Hazard Mitigation Planning Committee was formed to update and revise the plan as a multi-jurisdictional plan. Items covered in this update addressed the annual review process. Section 1.2 states that the Plan will be reviewed and updated annually to monitor the progress of its mitigation strategies and to integrate new technologies.

##### ***Opportunities for improvement:***

- The Plan documents changes that have occurred in the planning area as well as updates to the HIRA section. A clearer linkage between these updates and changes that have occurred should be included. It may also be useful to provide description of any items that prevented progress on mitigation actions (*for example*, funding, regulations, political issues, authorities, etc.) so that these items may be addressed more fully during the next update.

## **2. Resources for Implementing Your Approved Plan**

- The 2010 State of AAA Hazard Mitigation Plan identifies a number of potential funding resources for various mitigation actions. The grants identified in Chapter 7 of the State Plan are from both Federal and State sources. More information about applying for grants can be obtained from Joe Johns, AAA's State Hazard Mitigation Officer.
- FEMA is currently conducting a Risk MAP project in City of YYY. This project is in its infancy stage (LiDAR will be conducted in Fall 2011). In an effort to capitalize on current data and flood risk information, it is important that, during the Discovery Process, the municipality include representatives from departments that deal with flood risk (*for example*, hazard mitigation planning, emergency planning, and land use and zoning).
- The AAA State Division of Emergency Management mitigation team is available to help identify possible forms of assistance (technical and financial) to improve GIS capabilities, conduct studies and implement projects identified in the Plan.
- The AAA State DNR is currently working to create inundation maps for each high hazard dam in the State. This information will be made available and will assist in creating a more accurate hazard profile for dam failure events within the planning area.
- Benefit cost analysis (BCA) courses are offered through the State Hazard Mitigation Officer at 123-234-3456. As a key component of Hazard Mitigation Assistance (HMA) sub-application development, this course assists communities seeking funding for implementing effective mitigation projects. This course will also provide supplemental material on changes to the Tornado Safe Room program and will be led by State Division of Emergency Management.
- The FEMA Region has expressed interest in direct technical assistance on integrating non-regulatory flood risk products into hazard mitigation plans. The availability of this assistance is limited, but additional information can be found at:  
<http://www.fema.gov/library/viewRecord.do?id=4763>.

### **3.3 MULTI-JURISDICTION SUMMARY SPREADSHEET (*Optional*)**

For multi-jurisdictional plans, a Multi-jurisdiction Summary Spreadsheet may be completed by listing each participating jurisdiction, which required Elements for each jurisdiction were 'Met' or 'Not Met,' and when the adoption resolutions were received. This Summary Sheet does not imply that a mini-plan be developed for each jurisdiction; it should be used as an optional worksheet to ensure that each jurisdiction participating in the Plan has been documented and has met the requirements for those Elements (A through E).





## SECTION 4: REGULATION CHECKLIST

---

This section provides detailed guidance on how FEMA interprets the various requirements of the regulation for all Local Mitigation Plan reviews through a Regulatory Checklist. The guidance is limited only to the minimum requirements of *what* must be in a Local Mitigation Plan, and does not provide guidance on *how* the community should develop a plan. The Regulation Checklist includes the following Elements:

- 4.1 ELEMENT A: Planning Process
- 4.2 ELEMENT B: Hazard Identification and Risk Assessment
- 4.3 ELEMENT C: Mitigation Strategy
- 4.4 ELEMENT D: Plan Review, Evaluation, and Implementation
- 4.5 ELEMENT E: Plan Adoption
- 4.6 ELEMENT F: Additional State Requirements

Many requirements in the Checklist call for the plan to “document” or “describe” information. FEMA does not require specific formats for the plan or its content. Required information to “document” can be provided in the plan through a variety of formats, such as narrative, tables, lists, maps, etc. Examples provided in this *Guide* are samples of one or more approaches to meeting that particular requirement. Examples are not inclusive of all possible solutions to meet a requirement, and they are not necessarily considered “best practices” or exemplary. FEMA will recognize that there are many formats and types of documentation that may meet a particular requirement.

Terms from the regulation are defined in this *Guide*, where necessary. For example, many of the plan requirements ask for a “discussion” or “description.” FEMA considers the plan as the written record, or documentation, of the planning process. Therefore, many of these terms have the same meaning to document *what* was done. In addition, this *Guide* uses the terms “jurisdiction” and “community” interchangeably. For purposes of this *Guide*, these terms are equal to any local government developing a Local Mitigation Plan. This is defined at 44 CFR §201.2 as:

*“any county, municipality, city, town, township, public authority, school district, special district, intrastate district, council of governments (regardless of whether the council of governments is incorporated as a nonprofit corporation under State law), regional or interstate government entity, or agency or instrumentality of a local government; any Indian tribe or authorized tribal organization, or Alaska Native village or organization; and any rural community, unincorporated town or village, or other public entity.”*

Finally, an important distinction must be made between the words “shall” and “should” in the Mitigation Planning regulation at 44 CFR Part 201. The Regulation Checklist only includes the requirements where the regulation uses the words “shall” and “must,” and does not include the “should.” When the word “should” is used, the item is strongly recommended to be included in the plan, but its absence will not cause FEMA to disapprove the plan.

#### 4.1 ELEMENT A: PLANNING PROCESS

<b>Requirement §201.6(b)</b>	An open public involvement process is essential to the development of an effective plan. In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process shall include:
<b>§201.6(b)(1)</b>	(1) An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval;
<b>§201.6(b)(2)</b>	(2) An opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development, as well as businesses, academia and other private and non-profit interests to be involved in the planning process; and
<b>§201.6(b)(3)</b>	(3) Review and incorporation, if appropriate, of existing plans, studies, reports, and technical information.
<b>§201.6(c)(1)</b>	[The plan shall document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.
<b>§201.6(c)(4)(i)</b>	[The plan maintenance process shall include a] section describing the method and schedule of monitoring, evaluating, and updating the mitigation plan within a five-year cycle.
<b>§201.6(c)(4)(iii)</b>	[The plan maintenance process shall include a] discussion on how the community will continue public participation in the plan maintenance process.

**Overall Intent.** The planning process is as important as the plan itself. Any successful planning activity, such as developing a comprehensive plan or local land use plan, involves a cross-section of stakeholders and the public to reach consensus on desired outcomes or to resolve a community problem. The result is a common set of community values and widespread support for directing financial, technical, and human resources to an agreed upon course of action, usually identified in a plan. The same is true for mitigation planning. An effective and open planning process helps ensure that citizens understand risks and vulnerability, and they can work with the jurisdiction to support policies, actions, and tools that over the long-term will lead to a reduction in future losses.

Leadership, staffing, and in-house knowledge in local government may fluctuate over time. Therefore, the description of the planning process serves as a permanent record that explains how decisions were reached and who involved. FEMA will accept the planning process as defined by the community, as long as the mitigation plan includes a narrative

description of the process used to develop the mitigation plan—a systematic account about how the mitigation plan evolved from the formation of a planning team, to how the public participated, to how each section of the plan was developed, to what plans or studies were incorporated into the plan, to how it will be implemented. Documentation of a current planning process is required for both new and updated plans.

<b>ELEMENT</b>	<b>REQUIREMENTS</b>
<p><b>A1. Does the Plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction?</b>  <b>44 CFR 201.6(c)(1)</b></p> <p><i><b>Intent:</b> To inform the public and other readers about the overall approach to the plan’s development and serve as a permanent record of how decisions were made and who was involved. This record also is useful for the next plan update.</i></p>	<p>a. Documentation of how the plan was prepared <b>must</b> include the schedule or timeframe and activities that made up the plan’s development as well as who was involved. Documentation typically is met with a narrative description, but may also include, for example, other documentation such as copies of meeting minutes, sign-in sheets, or newspaper articles.</p> <p><i><b>Document</b> means provide the factual evidence for how the jurisdictions developed the plan.</i></p> <p>b. The plan <b>must</b> list the jurisdiction(s) participating in the plan that seek approval.</p> <p>c. The plan <b>must</b> identify who represented each jurisdiction. The Plan <b>must</b> provide, at a minimum, the jurisdiction represented and the person’s position or title and agency within the jurisdiction.</p> <p>d. For each jurisdiction seeking plan approval, the plan <b>must</b> document how they were involved in the planning process. For example, the plan may document meetings attended, data provided, or stakeholder and public involvement activities offered. Jurisdictions that adopt the plan without documenting how they participated in the planning process will not be approved.</p> <p><i><b>Involved in the process</b> means engaged as participants and given the chance to provide input to affect the plan’s content. This is more than simply being invited (See “<b>opportunity to be involved in the planning process</b>” in A2 below) or only adopting the plan.</i></p> <p>e. Plan updates <b>must</b> include documentation of the current planning process undertaken to update the plan.</p>
<p><b>A2. Does the Plan document an opportunity for neighboring communities, local 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?</b> 44 CFR 201.6(b)(2)</p>	<p>a. The plan <b>must</b> identify all stakeholders involved or given an opportunity to be involved in the planning process. At a minimum, stakeholders <b>must</b> include:</p> <ol style="list-style-type: none"> <li>1) Local and regional agencies involved in hazard mitigation activities;</li> <li>2) Agencies that have the authority to regulate development; and</li> <li>3) Neighboring communities.</li> </ol> <p><i>An <b>opportunity to be involved in the planning process</b> means that the stakeholders are engaged or invited as participants and given the chance to provide input to affect the plan’s content.</i></p>

<b>ELEMENT</b>	<b>REQUIREMENTS</b>
<p><b><i>Intent:</i></b> To demonstrate a deliberative planning process that involves stakeholders with the data and expertise needed to develop the plan, with responsibility or authority to implement hazard mitigation activities, and who will be most affected by the plan's outcomes.</p>	<p>b. The Plan <b>must</b> provide the agency or organization represented and the person's position or title within the agency.</p> <p>c. The plan <b>must</b> identify how the stakeholders were invited to participate in the process.</p> <p>Examples of stakeholders include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Local and regional agencies involved in hazard mitigation include public works, zoning, emergency management, local floodplain administrators, special districts, and GIS departments.</li> <li>• Agencies that have the authority to regulate development include planning and community development departments, building officials, planning commissions, or other elected officials.</li> <li>• Neighboring communities include adjacent counties and municipalities, such as those that are affected by similar hazard events or may be partners in hazard mitigation and response activities.</li> <li>• Other interests may be defined by each jurisdiction and will vary with each one. These include, but are not limited to, business, academia, and other private and non-profit interests depending on the unique characteristics of the community.</li> </ul>
<p><b>A3. Does the Plan document how the public was involved in the planning process during the drafting stage?</b>  <b>44 CFR 201.6(b)(1) and 201.6(c)(1)</b></p> <p><b><i>Intent:</i></b> To ensure citizens understand what the community is doing on their behalf, and to provide a chance for input on community vulnerabilities and mitigation activities that will inform the plan's content. Public involvement is also an opportunity to educate the public about hazards and risks in the community, types of activities to mitigate those risks, and how these impact them.</p>	<p>a. The plan <b>must</b> document how the public was given the opportunity to be involved in the planning process and how their feedback was incorporated into the plan. Examples include, but are not limited to, sign-in sheets from open meetings, interactive websites with drafts for public review and comment, questionnaires or surveys, or booths at popular community events.</p> <p>b. The opportunity for participation <b>must</b> occur during the plan development, which is prior to the comment period on the final plan and prior to the plan approval / adoption.</p>

ELEMENT	REQUIREMENTS
<p><b>A4. Does the Plan document the review and incorporation of existing plans, studies, reports, and technical information? 44 CFR 201.6(b)(3)</b></p> <p><i><b>Intent:</b> To identify existing data and information, shared objectives, and past and ongoing activities that can help inform the mitigation plan. It also helps identify the existing capabilities and planning mechanisms to implement the mitigation strategy.</i></p>	<p>a. The plan <b>must</b> document <i>what</i> existing plans, studies, reports, and technical information were reviewed. Examples of the types of existing sources reviewed include, but are not limited to, the state hazard mitigation plan, local comprehensive plans, hazard specific reports, and flood insurance studies.</p> <p>b. The plan <b>must</b> document <i>how</i> relevant information was incorporated into the mitigation plan.</p> <p><i><b>Incorporate</b> means to reference or include information from other existing sources to form the content of the mitigation plan.</i></p>
<p><b>A5. Is there discussion on how the community(ies) will continue public participation in the plan maintenance process? 44 CFR 201.6(c)(4)(iii)</b></p> <p><i><b>Intent:</b> To identify how the public will continue to have an opportunity to participate in the plan's maintenance and implementation over time.</i></p>	<p>a. The plan <b>must</b> describe how the jurisdiction(s) will continue to seek public participation after the plan has been approved and during the plan's implementation, monitoring and evaluation.</p> <p><i><b>Participation</b> means engaged and given the chance to provide feedback. Examples include, but are not limited to, periodic presentations on the plan's progress to elected officials, schools or other community groups, annual questionnaires or surveys, public meetings, postings on social media and interactive websites.</i></p>
<p><b>A6. Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a 5-year cycle)? 44 CFR 201.6(c)(4)(i)</b></p> <p><i><b>Intent:</b> To establish a process for jurisdictions to track the progress of the plan's implementation. This also serves as the basis of the next plan update.</i></p>	<p>a. The plan <b>must</b> identify how, when, and by whom the plan will be monitored. <i><b>Monitoring</b> means tracking the implementation of the plan over time. For example, monitoring may include a system for tracking the status of the identified hazard mitigation actions.</i></p> <p>b. The plan <b>must</b> identify how, when, and by whom the plan will be evaluated. <i><b>Evaluating</b> means assessing the effectiveness of the plan at achieving its stated purpose and goals.</i></p> <p>c. The plan <b>must</b> identify how, when, and by whom the plan will be updated. <i><b>Updating</b> means reviewing and revising the plan at least once every five years.</i></p> <p>d. The plan <b>must</b> include the title of the individual or name of the department/ agency responsible for leading each of these efforts.</p>

#### 4.2 ELEMENT B. HAZARD IDENTIFICATION AND RISK ASSESSMENT

<b>Requirement</b>	[The risk assessment shall include a] description of the type, location and extent of all natural hazards that can affect the jurisdiction. The plan shall include information on previous occurrences of hazard events and on the probability of future hazard events.
<b>§201.6(c)(2)(i)</b>	
<b>§201.6(c)(2)(ii)</b>	[The risk assessment shall include a] description of the jurisdiction’s vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community. All plans approved after October 1, 2008 must also address NFIP insured structures that have been repetitively damaged by floods. The plan should describe vulnerability in terms of:
<b>§201.6(c)(2)(ii)(A)</b>	(A) The types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard areas;
<b>§201.6(c)(2)(ii)(B)</b>	(B) An estimate of the potential dollar losses to vulnerable structures identified in ... this section and a description of the methodology used to prepare the estimate.
<b>§201.6(c)(2)(ii)(C)</b>	(C) Providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.
<b>§201.6(c)(2)(iii)</b>	For multi-jurisdictional plans, the risk assessment section must assess each jurisdiction’s risks where they vary from the risks facing the entire planning area.

***Overall Intent.*** The risk assessment provides the factual basis for activities proposed in the strategy that will reduce losses from identified hazards. A quality risk assessments makes a clear connection between the community’s vulnerability and the hazard mitigation actions. In other words, it provides sufficient information to enable the jurisdiction(s) to identify and prioritize appropriate hazard mitigation actions.

Local risk assessments do not need to be based on the most sophisticated technology, but do need to be accurate, current, and relevant. During a plan update, local jurisdictions assess current and expected future vulnerability to all hazards and integrate new hazard data such as recent hazard events and new flood studies. In the mitigation plan review, FEMA looks at the quality of the information in the risk assessment, not the quantity of information in the risk assessment.

The Mitigation Planning regulation includes several “optional” requirements for the vulnerability assessment. These are easily recognizable with the use of the term “should” in the requirement (See §201.6(c)(2)(ii)(A-C)). Although not required, these are strongly recommended to be included in the plan. However, their absence will not cause FEMA to disapprove the plan. These “optional” requirements were originally intended to meet the overall vulnerability assessment, and this analysis can assist with identifying mitigation actions.

<u>ELEMENT</u>	<u>REQUIREMENTS</u>
<p><b>B1. Does the Plan include a description of the type, location, and extent of all natural hazards that can affect each jurisdiction? 44 CFR 201.6(c)(2)(i) and 44 CFR 201.6(c)(2)(iii)</b></p> <p><i><b>Intent:</b> To understand the potential and chronic hazards affecting the planning area in order to identify which hazard risks are most significant and which jurisdictions or locations are most adversely affected.</i></p>	<p>a. The plan <b>must</b> include a description of the natural hazards that can affect the jurisdiction(s) in the planning area.</p> <p><i>A <b>natural hazard</b> is a source of harm or difficulty created by a meteorological, environmental, or geological event<sup>3</sup>. The plan <b>must</b> address natural hazards. Manmade or human-caused hazards may be included in the document, but these are not required and will not be reviewed to meet the requirements for natural hazards. In addition, FEMA will not require the removal of this extra information prior to plan approval.</i></p> <p>b. The plan <b>must</b> provide the rationale for the omission of any natural hazards that are commonly recognized to affect the jurisdiction(s) in the planning area.</p> <p>c. The description, or profile, <b>must</b> include information on location, extent, previous occurrences, and future probability for each hazard. Previous occurrences and future probability are addressed in sub-element B2.</p> <p>The information does not necessarily need to be described or presented separately for location, extent, previous occurrences, and future probability. For example, for some hazards, one map with explanatory text could provide information on location, extent, and future probability.</p> <p><i><b>Location</b> means the geographic areas in the planning area that are affected by the hazard. For many hazards, maps are the best way to illustrate location. However, location may be described in other formats. For example, if a geographically-specific location cannot be identified for a hazard, such as tornados, the plan may state that the entire planning area is equally at risk to that hazard.</i></p> <p><i><b>Extent</b> means the strength or magnitude of the hazard. For example, extent could be described in terms of the specific measurement of an occurrence on a scientific scale (for example, Enhanced Fujita Scale, Saffir-Simpson Hurricane Scale, Richter Scale, flood depth grids) and/or other hazard factors, such as duration and speed of onset. Extent is not the same as impacts, which are described in sub-element B3.</i></p>

<sup>3</sup> DHS Risk Lexicon, 2010 Edition. <http://www.dhs.gov/xlibrary/assets/dhs-risk-lexicon-2010.pdf>

<u>ELEMENT</u>	<u>REQUIREMENTS</u>
	<p>d. For participating jurisdictions in a multi-jurisdictional plan, the plan <b>must</b> describe any hazards that are unique and/or varied from those affecting the overall planning area.</p>
<p><b>B2. Does the Plan include information on previous occurrences of hazard events and on the probability of future hazard events for each jurisdiction? 44 CFR 201.6(c)(2)(i)</b></p> <p><i><b>Intent:</b> To understand potential impacts to the community based on information on the hazard events that have occurred in the past and the likelihood they will occur in the future.</i></p>	<p>a. The plan <b>must</b> include the history of previous hazard events for each of the identified hazards.</p> <p>b. The plan <b>must</b> include the probability of future events for each identified hazard.</p> <p><i><b>Probability</b> means the likelihood of the hazard occurring and may be defined in terms of general descriptors (for example, unlikely, likely, highly likely), historical frequencies, statistical probabilities (for example: 1% chance of occurrence in any given year), and/or hazard probability maps. If general descriptors are used, then they <b>must</b> be defined in the plan. For example, “highly likely” could be defined as equals near 100% chance of occurrence next year or happens every year.</i></p> <p>c. Plan updates <b>must</b> include hazard events that have occurred since the last plan was developed.</p>
<p><b>B3. Is there a description of each identified hazard’s impact on the community as well as an overall summary of the community’s vulnerability for each jurisdiction? 44 CFR 201.6(c)(2)(ii)</b></p> <p><i><b>Intent:</b> For each jurisdiction to consider their community as a whole and analyze the potential impacts of future hazard events and the vulnerabilities that could be reduced through hazard mitigation actions.</i></p>	<p>a. For each participating jurisdiction, the plan <b>must</b> describe the potential impacts of each of the identified hazards on the community.</p> <p><i><b>Impact</b> means the consequence or effect of the hazard on the community and its assets. Assets are determined by the community and include, for example, people, structures, facilities, systems, capabilities, and/or activities that have value to the community. For example, impacts could be described by referencing historical disaster impacts and/or an estimate of potential future losses (such as percent damage of total exposure).</i></p> <p>b. The plan <b>must</b> provide an overall summary of each jurisdiction’s vulnerability to the identified hazards. The overall summary of vulnerability identifies structures, systems, populations or other community assets as defined by the community that are susceptible to damage and loss from hazard events. A plan will meet this sub-element by addressing the requirements described in §201.6(c)(2)(ii)(A-C).</p> <p>Vulnerable assets and potential losses is more than a list of the total exposure of population, structures, and critical facilities in the planning area. An example of an overall summary is a list of key issues or problem statements that clearly describes the community’s greatest vulnerabilities and that will be addressed in the mitigation strategy.</p>



ELEMENT	REQUIREMENTS
<p><b>B4. Does the Plan address NFIP insured structures within each jurisdiction that have been repetitively damaged by floods? 44 CFR 201.6(c)(2)(ii)</b></p> <p><i><b>Intent:</b> To inform hazard mitigation actions for properties that have suffered repetitive damage due to flooding, particularly problem areas that may not be apparent on floodplain maps. Information on repetitive loss properties helps inform FEMA hazard mitigation assistance programs under the National Flood Insurance Act.</i></p>	<p>a. The plan <b>must</b> describe the types (residential, commercial, institutional, etc.) and estimate the numbers of repetitive loss properties located in identified flood hazard areas.</p> <p><i><b>Repetitive loss properties</b> are those for which two or more losses of at least \$1,000 each have been paid under the National Flood Insurance Program (NFIP) within any 10-year period since 1978.</i></p> <p><i><b>Severe repetitive loss properties</b> are residential properties that have at least four NFIP payments over \$5,000 each and the cumulative amount of such claims exceeds \$20,000, or at least two separate claims payments with the cumulative amount exceeding the market value of the building.</i></p> <p>Use of flood insurance claim and disaster assistance information is subject to The Privacy Act of 1974, as amended, which prohibits public release of the names of policy holders or recipients of financial assistance and the amount of the claim payment or assistance. However, maps showing general areas where claims have been paid can be made public. If a plan includes the names of policy holders or recipients of financial assistance and the amount of the claim payment or assistance, the plan cannot be approved until this Privacy Act covered information is removed from the plan.</p>

#### 4.3 ELEMENT C. MITIGATION STRATEGY

<b>Requirement</b> <b>§201.6(c)(3)</b>	[The plan shall include the following:] A <i>mitigation strategy</i> that provides the jurisdiction’s blueprint for reducing the potential losses identified in the risk assessment, based on existing authorities, policies, programs, and resources, and its ability to expand on and improve these existing tools.
<b>§201.6(c)(3)(i)</b>	[The hazard mitigation strategy shall include a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.
<b>§201.6(c)(3)(ii)</b>	[The hazard mitigation strategy shall include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure. All plans approved by FEMA after October 1, 2008, must also address the jurisdiction’s participation in the NFIP, and continued compliance with NFIP requirements, as appropriate.
<b>§201.6(c)(3)(iii)</b>	[The hazard mitigation strategy shall include an] action plan, describing how the action identified in paragraph (c)(3)(ii) of this section will be prioritized, implemented, and administered by the local jurisdiction. Prioritization shall include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.
<b>§201.6(c)(3)(iv)</b>	For multi-jurisdictional plans, there must be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.
<b>§201.6(c)(4)(ii)</b>	[The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvements, when appropriate.

***Overall Intent.*** The mitigation strategy serves as the long-term blueprint for reducing the potential losses identified in the risk assessment. The Stafford Act directs Local Mitigation Plans to describe hazard mitigation actions and establish a strategy to implement those actions.<sup>4</sup> Therefore, all other requirements for a Local Mitigation Plan lead to and support the mitigation strategy.

---

<sup>4</sup> Section 322(b), Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended, 42 U.S.C. 5165.

The mitigation strategy includes the development of goals and prioritized hazard mitigation actions. Goals are long-term policy statements and global visions that support the mitigation strategy. A critical step in the development of specific hazard mitigation actions and projects is assessing the community’s existing authorities, policies, programs, and resources and its capability to use or modify local tools to reduce losses and vulnerability from profiled hazards.

In the plan update, goals and actions are either reaffirmed or updated based on current conditions, including the completion of hazard mitigation initiatives, an updated or new risk assessment, or changes in State or local priorities.

<u>ELEMENT</u>	<u>REQUIREMENTS</u>
<p><b>C1. Does the plan document each jurisdiction’s existing authorities, policies, programs and resources, and its ability to expand on and improve these existing policies and programs? 44 CFR 201.6(c)(3)</b></p> <p><i><b>Intent:</b> To ensure that each jurisdiction evaluates its capabilities to accomplish hazard mitigation actions, through existing mechanisms. This is especially useful for multi-jurisdictional plans where local capability varies widely.</i></p>	<p>a. The plan <b>must</b> describe each jurisdiction’s existing authorities, policies, programs and resources available to accomplish hazard mitigation.</p> <p>Examples include, but are not limited to: staff involved in local planning activities, public works, and emergency management; funding through taxing authority, and annual budgets; or regulatory authorities for comprehensive planning, building codes, and ordinances.</p>
<p><b>C2. Does the Plan address each jurisdiction’s participation in the NFIP and continued compliance with NFIP requirements, as appropriate? 44 CFR 201.6(c)(3)(ii)</b></p> <p><i><b>Intent:</b> To demonstrate flood hazard mitigation efforts by the community through NFIP activities. Where FEMA is the official administering Federal agency of the NFIP, participation in the program is a basic community capability and resource for flood hazard mitigation activities.</i></p>	<p>a. The plan <b>must</b> describe each jurisdiction’s participation in the NFIP and describe their floodplain management program for continued compliance. Simply stating “The community will continue to comply with NFIP,” will <u>not</u> meet this requirement. The description could include, but is not limited to:</p> <ul style="list-style-type: none"> <li>• Adoption and enforcement of floodplain management requirements, including regulating new construction in Special Flood Hazard Areas (SFHAs);</li> <li>• Floodplain identification and mapping, including any local requests for map updates; or</li> <li>• Description of community assistance and monitoring activities.</li> </ul> <p>Jurisdictions that are currently not participating in the NFIP and where an FHBM or FIRM has been issued may meet this requirement by describing the reasons why the community does not participate.</p>

ELEMENT	REQUIREMENTS
<p><b>C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? 44 CFR 201.6(c)(3)(i)</b></p> <p><i><b>Intent:</b> To guide the development and implementation of hazard mitigation actions for the community(ies). Goals are statements of the community's visions for the future.</i></p>	<p>a. The plan <b>must</b> include general hazard mitigation goals that represent what the jurisdiction(s) seeks to accomplish through mitigation plan implementation.</p> <p><i><b>Goals</b> are broad policy statements that explain what is to be achieved.</i></p> <p>b. The goals <b>must</b> be consistent with the hazards identified in the plan.</p>
<p><b>C4. Does the Plan identify and analyze a comprehensive range of specific mitigation actions and projects for each jurisdiction being considered to reduce the effects of hazards, with emphasis on new and existing buildings and infrastructure? 44 CFR 201.6(c)(3)(ii) and 44 CFR 201.6(c)(3)(iv)</b></p> <p><i><b>Intent:</b> To ensure the hazard mitigation actions are based on the identified hazard vulnerabilities, are within the capability of each jurisdiction, and reduce or avoid future losses. This is the heart of the mitigation plan, and is essential to leading communities to reduce their risk. Communities, not FEMA, "own" the hazard mitigation actions in the strategy.</i></p>	<p>a. The plan <b>must</b> include a mitigation strategy that 1) analyzes actions and/or projects that the jurisdiction considered to reduce the impacts of hazards identified in the risk assessment, and 2) identifies the actions and/or projects that the jurisdiction intends to implement.</p> <p><i><b>Mitigation actions and projects</b> means a hazard mitigation action, activity or process (for example, adopting a building code) or it can be a physical project (for example, elevating structures or retrofitting critical infrastructure) designed to reduce or eliminate the long term risks from hazards. This sub-element can be met with either actions or projects, or a combination of actions and projects.</i></p> <p>The mitigation plan may include non-mitigation actions, such as actions that are emergency response or operational preparedness in nature. These will not be accepted as hazard mitigation actions, but neither will FEMA require these to be removed from the plan prior to approval.</p> <p><i>A <b>comprehensive range</b> consists of different hazard mitigation alternatives that address the vulnerabilities to the hazards that the jurisdiction(s) determine are most important.</i></p> <p>b. Each jurisdiction participating in the plan <b>must</b> have mitigation actions specific to that jurisdiction that are based on the community's risk and vulnerabilities, as well as community priorities.</p> <p>c. The action plan <b>must</b> reduce risk to existing buildings and infrastructure as well as limit any risk to new development and redevelopment. <i><b>With emphasis on new and existing building and infrastructure</b> means that the action plan includes a consideration of actions that address the built environment.</i></p>

ELEMENT	REQUIREMENTS
<p><b>C5. Does the Plan contain an action plan that describes how the actions identified will be prioritized (including cost benefit review), implemented, and administered by each jurisdiction? 44 CFR 201.6(c)(3)(iii) and 44 CFR (c)(3)(iv)</b></p> <p><i><b>Intent:</b> To identify how the plan will directly lead to implementation of the hazard mitigation actions. As opportunities arise for actions or projects to be implemented, the responsible entity will be able to take action towards completion of the activities.</i></p>	<ul style="list-style-type: none"> <li>a. The plan <b>must</b> describe the criteria used for prioritizing implementation of the actions.</li> <li>b. The plan <b>must</b> demonstrate when prioritizing hazard mitigation actions that the local jurisdictions considered the benefits that would result from the hazard mitigation actions versus the cost of those actions. The requirement is met as long as the economic considerations are summarized in the plan as part of the community’s analysis. A complete benefit-cost analysis is not required. Qualitative benefits (<i>for example</i>, quality of life, natural and beneficial values, or other “benefits”) can also be included in how actions will be prioritized.</li> <li>c. The plan <b>must</b> identify the position, office, department, or agency responsible for implementing and administering the action (for each jurisdiction), and identify potential funding sources and expected timeframes for completion.</li> </ul>
<p><b>C6. Does the Plan describe a process by which local governments will integrate the requirements of the mitigation plan into other planning mechanisms, such as comprehensive or capital improvement plans, when appropriate? 44 CFR 201.6(c)(4)(ii)</b></p> <p><i><b>Intent:</b> To assist communities in capitalizing on all available mechanisms that they have at their disposal to accomplish hazard mitigation and reduce risk.</i></p>	<ul style="list-style-type: none"> <li>a. The plan <b>must</b> describe the community’s process to integrate the data, information, and hazard mitigation goals and actions into other planning mechanisms.</li> <li>b. The plan <b>must</b> identify the local planning mechanisms where hazard mitigation information and/or actions may be incorporated.</li> </ul> <p><i><b>Planning mechanisms</b> means governance structures that are used to manage local land use development and community decision-making, such as comprehensive plans, capital improvement plans, or other long-range plans.</i></p> <ul style="list-style-type: none"> <li>c. A multi-jurisdictional plan <b>must</b> describe each participating jurisdiction’s individual process for integrating hazard mitigation actions applicable to their community into other planning mechanisms.</li> <li>d. The updated plan <b>must</b> explain how the jurisdiction(s) incorporated the mitigation plan, when appropriate, into other planning mechanisms as a demonstration of progress in local hazard mitigation efforts.</li> <li>e. The updated plan <b>must</b> continue to describe how the mitigation strategy, including the goals and hazard mitigation actions will be incorporated into other planning mechanisms.</li> </ul>

**4.4 ELEMENT D. PLAN REVIEW, EVALUATION, AND IMPLEMENTATION (Plan Updates Only)**

<b>Requirement §201.6(d)(3)</b>	A local jurisdiction must review and revise its plan to reflect changes in development, progress in local mitigation efforts, and changes in priorities, and resubmit if for approval within 5 years in order to continue to be eligible for mitigation project grant funding.
---------------------------------	--

**Overall Intent.** In order to continue to be an effective representation of the jurisdiction’s overall strategy for reducing its risks from natural hazards, the mitigation plan must reflect current conditions. This will require an assessment of the current development patterns and development pressures as well as an evaluation of any new hazard or risk information. The plan update is an opportunity for the jurisdiction to assess its previous goals and action plan, evaluate progress in implementing hazard mitigation actions, and adjust its actions to address the current realities.

Where conditions of growth and revisions in priorities may have changed very little in a community, much of the text in the updated plan may be unchanged. This is acceptable as long as it still fits the priorities of their community, and it reflects current conditions. The key for plan readers to recognize a good plan update is documentation of the community’s progress or changes in their hazard mitigation program, along with the community’s continued engagement in the mitigation planning process.

<u>ELEMENT</u>	<u>REQUIREMENTS</u>
<p><b>D1. Was the plan revised to reflect changes in development? 44 CFR 201.6(d)(3)</b></p> <p><i><b>Intent:</b> To ensure that the mitigation strategy continues to address the risk and vulnerabilities to existing and potential development, and takes into consideration possible future conditions that can impact the vulnerability of the community.</i></p>	<p>a. The plan <b>must</b> describe changes in development that have occurred in hazard prone areas and increased or decreased the vulnerability of each jurisdiction since the last plan was approved. If no changes in development impacted the jurisdiction’s overall vulnerability, plan updates may validate the information in the previously approved plan.</p> <p><b>Changes in development</b> means recent development (<i>for example</i>, construction completed since the last plan was approved), potential development (<i>for example</i>, development planned or under consideration by the jurisdiction), or conditions that may affect the risks and vulnerabilities of the jurisdictions (<i>for example</i>, climate variability, declining populations or projected increases in population, or foreclosures). Not all development will affect a jurisdiction’s vulnerability.</p>

<u>ELEMENT</u>	<u>REQUIREMENTS</u>
<p><b>D2. Was the plan revised to reflect progress in local mitigation efforts? 44 CFR 201.6(d)(3)</b></p> <p><i><b>Intent:</b> To evaluate and demonstrate progress made in the past five years in achieving goals and implementing actions outlined in their mitigation strategy.</i></p>	<p>a. The plan <b>must</b> describe the status of hazard mitigation actions in the previous plan by identifying those that have been completed or not completed. For actions that have not been completed, the plan <b>must</b> either describe whether the action is no longer relevant or be included as part of the updated action plan.</p>
<p><b>D3. Was the plan revised to reflect changes in priorities? 44 CFR 201.6(d)(3)</b></p> <p><i><b>Intent:</b> To ensure the plan reflects current conditions, including financial, legal, and political realities as well as post-disaster conditions.</i></p>	<p>a. The plan <b>must</b> describe if and how any priorities changed since the plan was previously approved.</p> <p>If no changes in priorities are necessary, plan updates may validate the information in the previously approved plan.</p>

#### 4.5 ELEMENT E. PLAN ADOPTION

<b>Requirement §201.6(c)(5)</b>	[The plan shall include...] Documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County commissioner, Tribal Council). For multi-jurisdictional plans, each jurisdiction requesting approval of the plan must document that it has been formally adopted.
---------------------------------	---

**Overall Intent.** Adoption by the local governing body demonstrates the jurisdiction’s commitment to fulfilling the hazard mitigation goals and actions outlined in the plan. Adoption legitimizes the plan and authorizes responsible agencies to execute their responsibilities. Updated plans also are adopted anew to demonstrate community recognition of the current planning process, changes that have occurred within the previous five years, and validate community priorities for hazard mitigation actions.

<u>ELEMENT</u>	<u>REQUIREMENTS</u>
<p><b>E1. Does the Plan include documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval? 44 CFR 201.6(c)(5)</b></p> <p><i><b>Intent:</b> To demonstrate the jurisdiction’s commitment to fulfilling the hazard mitigation goals outlined in the plan, and to authorize responsible agencies to execute their responsibilities.</i></p>	<p>a. The plan <b>must</b> include documentation of plan adoption, usually a resolution by the governing body or other authority.</p> <p>If the local jurisdiction has not passed a formal resolution, or used some other documentation of adoption, the clerk or city attorney <b>must</b> provide written confirmation that the action meets their community’s legal requirements for official adoption and/or the highest elected official or their designee <b>must</b> submit written proof of the adoption. The signature of one of these officials is required with the explanation or other proof of adoption.</p> <p>Minutes of a council or other meeting during which the plan is adopted will be sufficient if local law allows meeting records to be submitted as documentation of adoption. The clerk of the governing body, or city attorney, <b>must</b> provide a copy of the law and a brief, written explanation such as, “in accordance with section ___ of the city code/ordinance, this constitutes formal adoption of the measure,” with an official signature.</p> <p>If adopted after FEMA review, adoption <b>must</b> take place within one calendar year of receipt of FEMA’s “Approval Pending Adoption.” See Section 5, <i>Plan Review Procedure</i> for more information on “Approvable Pending Adoption.”</p>



<u>ELEMENT</u>	<u>REQUIREMENTS</u>
<p><b>E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? 44 CFR 201.6(c)(5)</b></p> <p><i><b>Intent:</b> To demonstrate the jurisdiction’s commitment to fulfilling the hazard mitigation goals outlined in the plan, and to authorize responsible agencies to execute their responsibilities.</i></p>	<p>a. Each jurisdiction that is included in the plan <b>must</b> have its governing body adopt the plan prior to FEMA approval, even when a regional agency has the authority to prepare such plans.</p> <p>As with single jurisdictional plans, in order for FEMA to give approval to a multi-jurisdictional plan, at least one participating jurisdiction <b>must</b> formally adopt the plan within one calendar year of FEMA’s designation of the plan as “Approvable Pending Adoption.” See Section 5, <i>Plan Review Procedure</i> for more information on “Approvable Pending Adoption.”</p>



## SECTION 5: PLAN REVIEW PROCEDURE

---

### 5.1 COMMUNICATING THE REVIEW

FEMA will work with State counterparts to establish mutually agreeable methods of communication for Local Mitigation Plan reviews. State officials completing reviews may have their own procedures or preferences for communication with the local government or with FEMA. However, a clear understanding of how information on Local Mitigation Plan reviews will be relayed, and where necessary issues resolved, will foster more positive relationships between all parties and provide for greater understanding of unique local situations.

**FEMA:** At a minimum, the following communication techniques will be employed by FEMA in coordination with State offices responsible for the review of Local Mitigation Plans:

- FEMA will provide a completed *Plan Review Tool* with the review determination, including a description of the required revisions in the Regulation Checklist, and recommendations in the Plan Assessment.
- FEMA will send copies of all signed correspondence electronically, not just by mail, to reduce the overall review time.

**FEMA, States and Local Governments:** The following communication techniques may also be employed by FEMA in coordination with State offices responsible for the review of Local Mitigation Plans:

- **Joint Reviews:** FEMA and the State may conduct a joint review by phone or in person to discuss the plan section-by-section, highlighting strengths of the community's mitigation plan, as well as areas where improvements make the plan more effective at reducing risks to known hazards.
- **Involve the Locals:** States may choose to include the local officials in joint reviews, or allow direct contact between FEMA and the local official to reduce review time.
- **Positive First Contact:** When revisions are required, FEMA may contact the State directly by phone to discuss revisions and offer an opportunity for changes prior to issuing a "Required Revisions" letter.
- **Phone First:** When revisions are required, State and/or local officials are encouraged to call FEMA for any clarifications or questions rather than conduct communication in writing.
- **Share Drafts:** Local officials may share drafts of their entire plan, or at least the results of the risk assessment, with the State and/or FEMA well in advance of finalizing the plan. Early feedback from the State and/or FEMA will let the jurisdiction know that it is on the right track, that additional material needs to be

added, or that major revisions need to be made in time to develop and submit an approvable plan by established deadlines.

- **Stay on Schedule:** States and local officials should coordinate with each other on procedures and schedules for State support of local mitigation planning efforts, initial State review of Local Mitigation Plans, and FEMA review and approval in time to meet deadlines.
- **Request Technical Assistance:** States and local officials may request technical assistance from FEMA during the development of the Local Mitigation Plan, not simply contact FEMA at the point of review to ensure the planning process is understood and executed successfully.

## 5.2 MITIGATION PLAN SUBMITTAL

**State:** The State is responsible for the initial review and coordination of all Local Mitigation Plans within that State. Once initial review by the State is complete, the State submits the plan to the respective FEMA Regional office requesting a FEMA review (See FEMA Regional office contact information at: <http://www.fema.gov/about/contact/regions.shtm>). This submittal consists of the following:

- a) Transmittal letter or email from the State Hazard Mitigation Officer, Governor's Authorized Representative, or other delegated State officer;
- b) Local Mitigation Plan document to be reviewed;
- c) *Plan Review Tool* completed by the State; and
- d) If the Plan is already adopted by one or more of the participating local jurisdictions, copies of any adopting resolution(s) or letter(s).

Plans may be submitted electronically or in paper copy, or both. Hard copies may be required for review purposes, and electronic copies may be requested for recordkeeping. If sending a paper copy, the State should include an "ATTENTION:" line on the mailing label with the name of the FEMA Mitigation Planner in the respective FEMA Regional office.

**FEMA:** Upon receipt, FEMA will provide confirmation to the State either by phone, email or mail.

## 5.3 MITIGATION PLAN REVIEW

### *Review Timeframes*

**FEMA:** All Local Mitigation Plans submitted to FEMA will be reviewed by FEMA using this *Local Mitigation Plan Review Guide* and the corresponding *Local Mitigation Plan Review Tool*.

FEMA will work with State officials to ensure plans are reviewed in a timely manner and to prioritize the order of the review of all plans submitted. All Local Mitigation Plans will be reviewed within 45 calendar dates, whenever possible. If FEMA is unable to complete a Local Mitigation Plan review within 45 days of receipt from the State, the FEMA Regional Administrator, or his/her designee will either:

- a) Send a signed letter to be received by the State within 10 calendar days after the end of the 45-day review period. The letter will include an explanation of the cause of any delays in the review of the Local Mitigation Plan and a reasonable projection of the date by which the plan review will be completed. If a completed review is sent to the State within 10 calendar days after the end of the 45-day review period, a signed cover letter will indicate the reason for the delay.

or

- b) Send a monthly status update to each State listing the status of all plans submitted to FEMA for review. This will include, at a minimum, the status of all plans received and currently under review, a reasonable projection of the date by which the plan review will be completed, and the cause for delays for any plans projected to be reviewed more than 45 days after receipt. This monthly update may also include plans approved, plans nearing expiration, or other status categories as deemed appropriate by FEMA.

Upon completion of a Plan review, FEMA will prepare and forward a notification in the form of a "Requires Revisions", "Approvable Pending Adoption (APA)" or "Approval" letter to the State. The notification to the State will include a copy of the *Local Mitigation Plan Review Tool*.

### ***Plan Revisions***

**FEMA:** Local Mitigation Plans that do not meet all of the requirements in 44 CFR 201.6 are returned with a "Requires Revisions." The required revisions are indicated on the Regulation Checklist (in the *Local Mitigation Plan Review Tool*) and sent to the State.

When a plan is not approved upon the first review, and requires revisions to meet 44 CFR Part 201, FEMA will complete subsequent plan reviews within 45 days of receipt from the State, whenever possible. ***Items a and b above, Review Timeframes, apply to these subsequent plan reviews as well.***

The review of a revised Local Mitigation Plan and FEMA's responses included in the *Mitigation Plan Review Tool* will take into consideration:

- a. only those Elements of the Tool where revisions were required in the previous review(s) to meet 44 CFR Part 201;

- b. information in the plan was deleted or changed from its previous version to make the plan no longer meet that Element of the *Local Mitigation Plan Review Tool*; or
- c. the entire plan if received by the Region more than one year after the Region's previous plan review was sent to the State.

**State:** Unless otherwise agreed upon between the State and FEMA, the State is responsible for forwarding the *Local Mitigation Plan Review Tool* to the local community. The local community may work with the State, jointly with the State and FEMA, or directly with FEMA to make the revisions. The local community resubmits the plan to the State, who is responsible again for initial review before forwarding the plan to FEMA.

## 5.4 MITIGATION PLAN APPROVAL AND ADOPTION

### ***Approvable Pending Adoption.***

Approval Pending Adoption (APA) is a recommended and potentially time-saving process by which jurisdictions submit the final draft Local Mitigation Plan for a review prior to formal jurisdictional adoption by the appropriate officials, agencies, or organizations. If FEMA determines the plan is not approvable, the responsible local agency or office will be able to address deficiencies before taking the plan through adoption, therefore avoiding unnecessary delays in plan approval.

**FEMA:** If all Elements are met except adoption, FEMA determines that the Local Mitigation Plan is APA. The FEMA Region sends an APA letter to the State who, in turn, forwards the determination to the local community. The jurisdiction can then proceed with the adoption process, knowing the adopted plan will be approved. When the APA plan is adopted by the jurisdiction, and FEMA has received the documentation of adoption, then it will be formally approved through a signed FEMA approval letter.

**State:** Unless otherwise agreed upon between the State and FEMA, all APA letters from FEMA are sent to the State; the State is responsible for communicating the status of the Plan with the local community.

**Local Government:** If adopted after FEMA review, adoption must take place within one calendar year of receipt of FEMA's APA letter. If the plan is not adopted within one calendar year of FEMA's APA letter, the jurisdiction must update the entire plan and resubmit it for FEMA review. The plan approval date begins the five-year approval period and sets the expiration date for the plan. The official approval date is indicated on the signed FEMA approval letter. In addition to providing the approval date, it also indicates the expiration date of the plan.

As with single jurisdictional plans, in order for FEMA to approve a multi-jurisdictional plan, at least one participating jurisdiction must formally adopt the plan within one calendar year of FEMA's designation of the plan as APA. Participants of a multi-jurisdictional plan will assume the expiration date five years from the first jurisdiction's approval date regardless of the other participant's subsequent adoption date(s). The five-year approval period does not get "re-set" each time another participating jurisdiction adopts the plan.

For example, if jurisdiction #1 is the first jurisdiction to formally adopt the Blue County Multi-Jurisdictional Hazard Mitigation Plan and receives FEMA's "approval" of the plan on January 15, 2008, the plan will expire on January 15, 2013, exactly five years later. If jurisdiction #2 does not formally adopt the same plan until July 15, 2009, its eligibility would expire on January 15, 2013, the same exact date that Blue County's plan received "approval" when the plan was first approved. Thus, jurisdiction #2 does not benefit from the full five-year approval timeframe, but only 3½ years. FEMA recommends that all participating jurisdictions coordinate the adoption process as soon as the plan has received APA status to ensure that all participants are covered by a plan for the full five years.

### ***Approved***

**FEMA:** Once all Elements are 'Met' and the adoption resolution is received by the FEMA Regional office, FEMA will send an "Approved" letter signed by the Regional Administrator or his/her designee to the State. This designee may be the Regional Mitigation Division Director, Risk Analysis Branch Chief, or other designated official. Correspondence for "Approved" plans will identify, at a minimum, the name of the approved plan, jurisdiction(s) that have adopted the plan, date(s) of plan adoption, date of plan approval, and the expiration date of FEMA's approval of the plan. For multi-jurisdictional plans, this information may be included in the *Local Mitigation Plan Review Tool* or other attachment.

Approval letter(s) for multi-jurisdictional plans will clearly read that the expiration date of FEMA's approval of the plan applies for all participating jurisdictions, regardless of different adoption dates. If the plan is multi-jurisdictional and all participating jurisdiction's adoptions are not received by FEMA at the same time, more than one approval letter will be sent to the State as additional adoptions are received by FEMA. A completed *Local Mitigation Plan Review Tool* will accompany correspondence for all approved Local Mitigation Plans.

**State:** Unless otherwise agreed upon between the State and FEMA, all approval letters from FEMA are sent to the State; the State is responsible for communicating the approval with the local community.





# APPENDIX A:

## LOCAL MITIGATION PLAN REVIEW TOOL

---

The *Local Mitigation Plan Review Tool* demonstrates how the Local Mitigation Plan meets the regulation in 44 CFR §201.6 and offers States and FEMA Mitigation Planners an opportunity to provide feedback to the community.

- The Regulation Checklist provides a summary of FEMA’s evaluation of whether the Plan has addressed all requirements.
- The Plan Assessment identifies the plan’s strengths as well as documents areas for future improvement.
- The Multi-jurisdiction Summary Sheet is an optional worksheet that can be used to document how each jurisdiction met the requirements of the each Element of the Plan (Planning Process; Hazard Identification and Risk Assessment; Mitigation Strategy; Plan Review, Evaluation, and Implementation; and Plan Adoption).

The FEMA Mitigation Planner must reference this *Local Mitigation Plan Review Guide* when completing the *Local Mitigation Plan Review Tool*.

<b>Jurisdiction:</b>	<b>Title of Plan:</b>	<b>Date of Plan:</b>
<b>Local Point of Contact:</b>		<b>Address:</b>
<b>Title:</b>		
<b>Agency:</b>		
<b>Phone Number:</b>		
		<b>E-Mail:</b>

<b>State Reviewer:</b>	<b>Title:</b>	<b>Date:</b>

<b>FEMA Reviewer:</b>	<b>Title:</b>	<b>Date:</b>
<b>Date Received in FEMA Region (insert #)</b>		
<b>Plan Not Approved</b>		
<b>Plan Approvable Pending Adoption</b>		
<b>Plan Approved</b>		

**SECTION 1:  
REGULATION CHECKLIST**

**INSTRUCTIONS:** The Regulation Checklist must be completed by FEMA. The purpose of the Checklist is to identify the location of relevant or applicable content in the Plan by Element/sub-element and to determine if each requirement has been ‘Met’ or ‘Not Met.’ The ‘Required Revisions’ summary at the bottom of each Element must be completed by FEMA to provide a clear explanation of the revisions that are required for plan approval. Required revisions must be explained for each plan sub-element that is ‘Not Met.’ Sub-elements should be referenced in each summary by using the appropriate numbers (A1, B3, etc.), where applicable. Requirements for each Element and sub-element are described in detail in this *Plan Review Guide* in Section 4, Regulation Checklist.

<b>1. REGULATION CHECKLIST</b>	<b>Location in Plan</b>		<b>Not</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>	<b>(section and/or page number)</b>	<b>Met</b>	<b>Met</b>
<b>ELEMENT A. PLANNING PROCESS</b>			
A1. Does the Plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction? (Requirement §201.6(c)(1))			
A2. Does the Plan document an opportunity for neighboring communities, local 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? (Requirement §201.6(b)(2))			
A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))			
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))			
A5. Is there discussion of how the community(ies) will continue public participation in the plan maintenance process? (Requirement §201.6(c)(4)(iii))			
A6. Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a 5-year cycle)? (Requirement §201.6(c)(4)(i))			
<b>ELEMENT A: REQUIRED REVISIONS</b>			

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan</b> (section and/or page number)	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
<b>ELEMENT B. HAZARD IDENTIFICATION AND RISK ASSESSMENT</b>				
B1. Does the Plan include a description of the type, location, and extent of all natural hazards that can affect each jurisdiction(s)? (Requirement §201.6(c)(2)(i))				
B2. Does the Plan include information on previous occurrences of hazard events and on the probability of future hazard events for each jurisdiction? (Requirement §201.6(c)(2)(i))				
B3. Is there a description of each identified hazard’s impact on the community as well as an overall summary of the community’s vulnerability for each jurisdiction? (Requirement §201.6(c)(2)(ii))				
B4. Does the Plan address NFIP insured structures within the jurisdiction that have been repetitively damaged by floods? (Requirement §201.6(c)(2)(ii))				
<b><u>ELEMENT B: REQUIRED REVISIONS</u></b>				
<b>ELEMENT C. MITIGATION STRATEGY</b>				
C1. Does the plan document each jurisdiction’s existing authorities, policies, programs and resources and its ability to expand on and improve these existing policies and programs? (Requirement §201.6(c)(3))				
C2. Does the Plan address each jurisdiction’s participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement §201.6(c)(3)(ii))				
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))				
C4. Does the Plan identify and analyze a comprehensive range of specific mitigation actions and projects for each jurisdiction being considered to reduce the effects of hazards, with emphasis on new and existing buildings and infrastructure? (Requirement §201.6(c)(3)(ii))				
C5. Does the Plan contain an action plan that describes how the actions identified will be prioritized (including cost benefit review), implemented, and administered by each jurisdiction? (Requirement §201.6(c)(3)(iv)); (Requirement §201.6(c)(3)(iii))				
C6. Does the Plan describe a process by which local governments will integrate the requirements of the mitigation plan into other planning mechanisms, such as comprehensive or capital improvement plans, when appropriate? (Requirement §201.6(c)(4)(ii))				
<b><u>ELEMENT C: REQUIRED REVISIONS</u></b>				

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan</b> (section and/or page number)	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
<b>ELEMENT D. PLAN REVIEW, EVALUATION, AND IMPLEMENTATION</b> (applicable to plan updates only)				
D1. Was the plan revised to reflect changes in development? (Requirement §201.6(d)(3))				
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))				
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))				
<b><u>ELEMENT D: REQUIRED REVISIONS</u></b>				
<b>ELEMENT E. PLAN ADOPTION</b>				
E1. Does the Plan include documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval? (Requirement §201.6(c)(5))				
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))				
<b><u>ELEMENT E: REQUIRED REVISIONS</u></b>				
<b>ELEMENT F. ADDITIONAL STATE REQUIREMENTS (OPTIONAL FOR STATE REVIEWERS ONLY; NOT TO BE COMPLETED BY FEMA)</b>				
F1.				
F2.				
<b><u>ELEMENT F: REQUIRED REVISIONS</u></b>				

## SECTION 2: PLAN ASSESSMENT

**INSTRUCTIONS:** The purpose of the Plan Assessment is to offer the local community more comprehensive feedback to the community on the quality and utility of the plan in a narrative format. The audience for the Plan Assessment is not only the plan developer/local community planner, but also elected officials, local departments and agencies, and others involved in implementing the Local Mitigation Plan. The Plan Assessment must be completed by FEMA. The Assessment is an opportunity for FEMA to provide feedback and information to the community on: 1) suggested improvements to the Plan; 2) specific sections in the Plan where the community has gone above and beyond minimum requirements; 3) recommendations for plan implementation; and 4) ongoing partnership(s) and information on other FEMA programs, specifically RiskMAP and Hazard Mitigation Assistance programs. The Plan Assessment is divided into two sections:

1. Plan Strengths and Opportunities for Improvement
2. Resources for Implementing Your Approved Plan

***Plan Strengths and Opportunities for Improvement*** is organized according to the plan Elements listed in the Regulation Checklist. Each Element includes a series of italicized bulleted items that are suggested topics for consideration while evaluating plans, but it is not intended to be a comprehensive list. FEMA Mitigation Planners are not required to answer each bullet item, and should use them as a guide to paraphrase their own written assessment (2-3 sentences) of each Element.

The Plan Assessment must not reiterate the required revisions from the Regulation Checklist or be regulatory in nature, and should be open-ended and to provide the community with suggestions for improvements or recommended revisions. The recommended revisions are suggestions for improvement and are not required to be made for the Plan to meet Federal regulatory requirements. The italicized text should be deleted once FEMA has added comments regarding strengths of the plan and potential improvements for future plan revisions. It is recommended that the Plan Assessment be a short synopsis of the overall strengths and weaknesses of the Plan (no longer than two pages), rather than a complete recap section by section.

***Resources for Implementing Your Approved Plan*** provides a place for FEMA to offer information, data sources and general suggestions on the overall plan implementation and maintenance process. Information on other possible sources of assistance including, but not limited to, existing publications, grant funding or training opportunities, can be provided. States may add state and local resources, if available.

## **A. Plan Strengths and Opportunities for Improvement**

This section provides a discussion of the strengths of the plan document and identifies areas where these could be improved beyond minimum requirements.

### **Element A: Planning Process**

*How does the Plan go above and beyond minimum requirements to document the planning process with respect to:*

- *Involvement of stakeholders (elected officials/decision makers, plan implementers, business owners, academic institutions, utility companies, water/sanitation districts, etc.);*
- *Involvement of Planning, Emergency Management, Public Works Departments or other planning agencies (i.e., regional planning councils);*
- *Diverse methods of participation (meetings, surveys, online, etc.); and*
- *Reflective of an open and inclusive public involvement process.*

### **Element B: Hazard Identification and Risk Assessment**

*In addition to the requirements listed in the Regulation Checklist, 44 CFR 201.6 Local Mitigation Plans identifies additional elements that should be included as part of a plan's risk assessment. The plan should describe vulnerability in terms of:*

- 1) *A general description of land uses and future development trends within the community so that mitigation options can be considered in future land use decisions;*
- 2) *The types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard areas; and*
- 3) *A description of potential dollar losses to vulnerable structures, and a description of the methodology used to prepare the estimate.*

*How does the Plan go above and beyond minimum requirements to document the Hazard Identification and Risk Assessment with respect to:*

- *Use of best available data (flood maps, HAZUS, flood studies) to describe significant hazards;*
- *Communication of risk on people, property, and infrastructure to the public (through tables, charts, maps, photos, etc.);*
- *Incorporation of techniques and methodologies to estimate dollar losses to vulnerable structures;*
- *Incorporation of Risk MAP products (i.e., depth grids, Flood Risk Report, Changes Since Last FIRM, Areas of Mitigation Interest, etc.); and*
- *Identification of any data gaps that can be filled as new data became available.*

### **Element C: Mitigation Strategy**

*How does the Plan go above and beyond minimum requirements to document the Mitigation Strategy with respect to:*

- *Key problems identified in, and linkages to, the vulnerability assessment;*
- *Serving as a blueprint for reducing potential losses identified in the Hazard Identification and Risk Assessment;*
- *Plan content flow from the risk assessment (problem identification) to goal setting to mitigation action development;*
- *An understanding of mitigation principles (diversity of actions that include structural projects, preventative measures, outreach activities, property protection measures, post-disaster actions, etc);*
- *Specific mitigation actions for each participating jurisdictions that reflects their unique risks and capabilities;*
- *Integration of mitigation actions with existing local authorities, policies, programs, and resources; and*
- *Discussion of existing programs (including the NFIP), plans, and policies that could be used to implement mitigation, as well as document past projects.*

### **Element D: Plan Update, Evaluation, and Implementation (Plan Updates Only)**

*How does the Plan go above and beyond minimum requirements to document the 5-year Evaluation and Implementation measures with respect to:*

- *Status of previously recommended mitigation actions;*
- *Identification of barriers or obstacles to successful implementation or completion of mitigation actions, along with possible solutions for overcoming risk;*
- *Documentation of annual reviews and committee involvement;*
- *Identification of a lead person to take ownership of, and champion the Plan;*
- *Reducing risks from natural hazards and serving as a guide for decisions makers as they commit resources to reducing the effects of natural hazards;*
- *An approach to evaluating future conditions (i.e. socio-economic, environmental, demographic, change in built environment etc.);*
- *Discussion of how changing conditions and opportunities could impact community resilience in the long term; and*
- *Discussion of how the mitigation goals and actions support the long-term community vision for increased resilience.*

## **B. Resources for Implementing Your Approved Plan**

*Ideas may be offered on moving the mitigation plan forward and continuing the relationship with key mitigation stakeholders such as the following:*

- *What FEMA assistance (funding) programs are available (for example, Hazard Mitigation Assistance (HMA)) to the jurisdiction(s) to assist with implementing the mitigation actions?*
- *What other Federal programs (National Flood Insurance Program (NFIP), Community Rating System (CRS), Risk MAP, etc.) may provide assistance for mitigation activities?*
- *What publications, technical guidance or other resources are available to the jurisdiction(s) relevant to the identified mitigation actions?*
- *Are there upcoming trainings/workshops (Benefit-Cost Analysis (BCA), HMA, etc.) to assist the jurisdictions(s)?*
- *What mitigation actions can be funded by other Federal agencies (for example, U.S. Forest Service, National Oceanic and Atmospheric Administration (NOAA), Environmental Protection Agency (EPA) Smart Growth, Housing and Urban Development (HUD) Sustainable Communities, etc.) and/or state and local agencies?*



**SECTION 3:  
MULTI-JURISDICTION SUMMARY SHEET (OPTIONAL)**

**INSTRUCTIONS:** For multi-jurisdictional plans, a Multi-jurisdiction Summary Spreadsheet may be completed by listing each participating jurisdiction, which required Elements for each jurisdiction were ‘Met’ or ‘Not Met,’ and when the adoption resolutions were received. This Summary Sheet does not imply that a mini-plan be developed for each jurisdiction; it should be used as an optional worksheet to ensure that each jurisdiction participating in the Plan has been documented and has met the requirements for those Elements (A through E).

MULTI-JURISDICTION SUMMARY SHEET												
#	Jurisdiction Name	Jurisdiction Type (city/borough/ township/ village, etc.)	Plan POC	Mailing Address	Email	Phone	Requirements Met (Y/N)					
							A. Planning Process	B. Hazard Identification & Risk Assessment	C. Mitigation Strategy	D. Plan Review, Evaluation & Implementation	E. Plan Adoption	F. State Requirements
1												
2												
3												
4												
5												
6												
7												
8												
9												

**MULTI-JURISDICTION SUMMARY SHEET**

#	Jurisdiction Name	Jurisdiction Type (city/borough/ township/ village, etc.)	Plan POC	Mailing Address	Email	Phone	Requirements Met (Y/N)					
							A. Planning Process	B. Hazard Identification & Risk Assessment	C. Mitigation Strategy	D. Plan Review, Evaluation & Implementation	E. Plan Adoption	F. State Requirements
10												
11												
12												
13												
14												
15												
16												
17												
18												
19												
20												






SEP 30 2011



FEMA

MEMORANDUM FOR: Regional Administrators  
FEMA Regions I-X

FROM: Sandra K. Knight, PhD, PE   
Deputy Associate Administrator for Mitigation  
Federal Insurance and Mitigation Administration

SUBJECT: Mitigation Planning (MT-PL) #15 Memorandum  
*Local Mitigation Plan Review Guide*

The purpose of this memo is to transmit the *Local Mitigation Plan Review Guide* to implement provisions under the Code of Federal Regulations (CFR) Title 44 - *Emergency Management and Assistance*, specifically 44 CFR 201.6, *Local Mitigation Plans*. The *Guide* is the official guidance utilized by FEMA and State governments to review local mitigation plans against the requirements of 44 CFR 201.

This *Guide* will be effective starting October 1, 2012, for all local mitigation plans submitted to States and FEMA for review. FEMA is issuing this *Guide* as optional for immediate use as of the date of this memorandum. Many communities are presently in the process of developing local mitigation plans, and these community-wide planning processes last as much as a year or more. All communities currently reference the *Local Multi-Hazard Mitigation Planning Guidance* (June, 2008) and the corresponding Local Mitigation Plan Review Crosswalk to complete mitigation plan reviews. This transition period will allow adequate time for States and local governments to familiarize themselves with the new *Guide*. As of October 1, 2012, this document will supersede the *Local Multi-Hazard Mitigation Planning Guidance* (June, 2008).

The *Local Mitigation Plan Review Guide* contains several significant changes from the current local mitigation planning guidance:

- Stronger emphasis on Mitigation Strategy requirements;
- Simplified guidance only includes the regulatory requirements;
- New Guiding Principles and Intent statements support regulatory requirements;
- Plan Review Tool replaces the existing Crosswalk in a new format that is easier to use; and
- Plan Review Tool communicates implementation of the plan as well as improvements to the plan.

SEP 30 2011

Page 2

I am requesting that you provide this new *Local Mitigation Plan Review Guide* to your State Hazard Mitigation Officers. If you need additional assistance, please contact the Kathleen Smith, Risk Assessment Branch, by telephone at (202) 646-4372.

Enclosure

Distribution List (electronic distribution only):

Office of the Assistant Administrator for Flood Insurance and Mitigation

Director, Risk Analysis Division

Director, Risk Reduction Division

Director, Risk Insurance Division

Regional Mitigation Division Directors

Regional Risk Analysis Branch Chiefs

Regional Risk Reduction Branch Chiefs

Legislative Affairs

Office of Chief Counsel