

# Local Mitigation Plan Review



Katie Sommers

608-242-3222

[katie.sommers@wisconsin.gov](mailto:katie.sommers@wisconsin.gov)

# Plan Approval

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- ❑ Become familiar with the plan development guidance and the plan review tool and guidance (Sections 5 and 11)
- ❑ Devise a plan to meet all required elements
- ❑ Submit first draft to WEM along with a completed and detailed electronic plan review tool

# WEM Plan Review

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- Possible outcomes of a WEM plan review:
  - Meets all requirements
    - Send one paper copy and two CD copies to WEM
    - WEM will certify the plan and forward to FEMA RV
  - Does not meet all requirements
    - WEM will return to community for revisions and then community will resubmit to WEM

# FEMA Plan Review

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- Possible outcomes of a FEMA review:
  - Determination of “meets requirements”
    - All participating jurisdictions must adopt the plan and submit adoption resolutions to WEM
    - Upon receipt of resolutions, FEMA will issue their final plan approval letter with the approval date
  - FEMA returns to community (via WEM) for revisions and community resubmits to WEM who forwards to FEMA

# CFR and Plan Review Tool Documents

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- Hazard Mitigation Planning; Interim Final Rule 44 CFR Part 201  
<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=e63c0b17b2c76390184c081f4e63611d&rgn=div5&view=text&node=44:1.0.1.4.53&idno=44>
  
- Local Mitigation Plan Review Guide  
<http://www.fema.gov/library/viewRecord.do?id=3336>
  - Provides a detailed description of plan criteria
  - Provides examples of satisfactory and unsatisfactory narratives and revisions
  - Note the difference between “shall” and “should”
    - Shall = must (required)
    - Should = may (recommended)

# Troublesome Elements



Ways to Remedy...

# Frequently missed elements...

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- ❑ Documentation of meetings, dates, public notices, agendas, sign-in sheets, minutes, etc.
- ❑ **Narrative describing how each jurisdiction participated in the planning process.**
  - **Be explicit for each community**
  - **Matrix or table may be useful**
- ❑ Description of how the public (including residents, businesses, and other interested parties) were given the opportunity to comment on the plan. If there were comments, include them in the plan. If there were no comments, say that.

# More frequently missed elements...

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- Discussion of the opportunity to participate in the planning process for
  - **neighboring communities**
  - agencies involved in hazard mitigation
  - businesses, academia, and other relevant private and non-profit interests
  
- **Location** or geographic areas in the community that would be affected by each hazard
  - unless otherwise noted hazards are not restricted by geography and affect the entire county equally
  
- **All hazards** that impact the jurisdiction(s)
  - dam failure, coastal erosion
  - human-made hazards are not required but may be included

# And yet more frequently missed elements...

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- **Probability, likelihood, or frequency** that the hazard event will occur in an area:
  - Statistical: 1 event in 10 years = 10% chance
  - OR
  - Historical: High, Medium, Low - describe what designations mean!
  
- **Benefit Cost Analysis** discussion - consider the benefits that would result from the mitigation actions (including projects) versus the cost of those actions
  - Project costs are continually changing. Therefore a BCA will be completed as funds become available and during project development.
  
- **Plan maintenance process** - use the words “monitor,” “evaluate,” and “update.”

# And finally, some more frequently missed elements

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- Prioritization of mitigation actions
  - L, M, H, or 1, 2, 3
  - **Explain prioritization process!**
- Who will implement the actions?
- What funding sources are available for the action items?
  - HMGP
  - FMA
  - CDBG
  - County or municipal budget
  - Other state and federal funding opportunities
- Participating jurisdictions must adopt the plan to be eligible for mitigation project funds

# Some New Elements

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- ❑ Note all communities' participation in NFIP: those mapped, those not mapped, and those not participating.
- ❑ Highlight actions related to continued compliance with the NFIP for each NFIP compliant jurisdiction.
- ❑ Note a timeline, funding sources, and the person or agency responsible for each mitigation action.
- ❑ Action items for communities: should not have all communities listed for every action item.

# Filling Out the Plan Review Tool

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- ❑ An accurate and in-depth plan review tool will insure that a plan is given credit for all elements completed
- ❑ Plan “section” is discouraged (i.e. hazard analysis section)
- ❑ Page number **is** required; be specific
- ❑ If a risk is identified it must be profiled unless an explanation is given that explains the reasons for not doing so (e.g. “Earthquakes are a very low risk in this area of the United States.”)

# Plan Update Issues

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- ❑ Summarize changes made for each section (i.e. matrix or chart).
- ❑ List which mitigation actions have been completed, deleted, or changed and why.
- ❑ Make sure to review the previous crosswalk for any recommended revisions and address data deficiencies.

# Questions?

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Please do not hesitate to contact me  
with questions during plan  
development.

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