

FEMA Region V Local Plan Review Help Sheet

April 2009

This help sheet combines the October 2008 FEMA Local Mitigation Plan Crosswalk with the July 2008 FEMA Planning guidance for Local Hazard Mitigation Plans.

It outlines what kind of information is necessary in order to receive Satisfactory scores for each of the planning requirements without having to turn to the guidance document. Items that are marked as “must” and “shall” are items that reviewers will be looking for in FEMA plan reviews for each of the requirements. It also includes tips on how to meet the Plan Update Criteria.

This guidance crosswalk is intended **only** as guidance to assist States and local communities in understanding the local planning requirements, and **not** as a change in the Interim Final Rule of the Local Mitigation Planning standards or a change in FEMA policy. The corresponding page numbers shown in this Help Sheet refer to the page numbers in the Local Multi-Hazard Mitigation Planning Guidance (July 2008) or “Blue Book” guidance, as it is sometimes referred.

Any questions on this help sheet can be directed to Jonathan (J.P.) Marsch at 312-408-5226 or to jonathan.marsch@dhs.gov

PREREQUISITE(S)

1. Adoption by the Local Governing Body

Requirement §201.6(c)(5): [The local hazard mitigation 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).

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Has the local governing body adopted new or updated plan?	p.17-18	<p>Shall indicate 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).</p> <p>NOTE: Plans without adoption documentation may “meet requirements” by the Region if all of the other plan standards are met.</p> <p>***PLAN MUST BE ADOPTED WITHIN ONE YEAR OF “MEETING FEMA REQUIREMENTS” OR THE PLAN MUST BE UPDATED AND RE-SUBMITTED TO FEMA***</p>		
B. Is supporting documentation, such as a resolution, included?	p.17-18	<p>The plan shall include documentation of the resolution adopting the plan.</p> <p>PLAN UPDATES: The updated plan shall include a copy of the resolution or other documentation of formal adoption of the updated plan dated within one year of FEMA’s “meets FEMA Requirements”, The resolution or adoption for the previously approved plan will NOT be accepted for plan updates.</p>		
SUMMARY SCORE				

2. Multi-Jurisdictional Plan Adoption

Requirement §201.6(c)(5): For multi-jurisdictional plans, each jurisdiction requesting approval of the plan **must** document that it has been formally adopted.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Does the new or updated plan indicate the specific jurisdictions represented in the plan?	p.18-19	Shall indicate the specific jurisdictions represented in the plan.		
B. For each jurisdiction, has the local governing body adopted the new or updated plan?	p.18-19	<p>In order for multi-jurisdictional plans to be approved, each jurisdiction that is included in the plan must have its governing body adopt the plan.</p> <p>NOTE: Plans without adoption documentation may “meet requirements” by the Region if all of the other plan standards are met.</p> <p>***PLAN MUST BE ADOPTED WITHIN ONE YEAR OF “MEETING FEMA REQUIREMENTS” OR THE PLAN MUST BE UPDATED AND RE-SUBMITTED TO FEMA***</p>		
C. Is supporting documentation, such as a resolution, included for each participating jurisdiction?	<p>p.18-20</p> <p>PLAN UPDATE: P. 20-21</p>	<p>The plan must be formally adopted by at least one local governing body (County or individual jurisdiction) and a copy of each of the signed plan adoption resolutions is included.</p> <p>NOTE: The first plan approval letter sent by FEMA for a multi-jurisdictional plan starts the five-year clock, whether it's for the county or a jurisdiction.</p> <p>PLAN UPDATE: Each jurisdiction that is seeking approval for the plan must have its governing body adopt the updated plan. The resolution or adoption for the previously approved plan will NOT be accepted for plan updates.</p>		
SUMMARY SCORE				

3. Multi-Jurisdictional Planning Participation

Requirement §201.6(a)(3): Multi-jurisdictional plans (e.g., watershed plans) may be accepted, as appropriate, as long as each jurisdiction has participated in the process ... Statewide plans will not be accepted as multi-jurisdictional plans.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Does the new or updated plan describe how each jurisdiction participated in the plan's development?	P.20-23	The plan must document how each jurisdiction requesting FEMA recognition of the plan participated in the planning		

		<p>process.</p> <p>This can be illustrated through narrative or tables indicating the participating jurisdictions and members that represented them in the planning process. Participation from communities can be documented by meetings attended, conference calls, risk assessment or mitigation strategy information sent in, surveys, etc.</p>		
B. Does the updated plan identify all participating jurisdictions, including new, continuing, and the jurisdictions that no longer participate in the plan?	PLAN UPDATE: P.21	<p>PLAN UPDATE: The <i>updated</i> plan must identify the following:</p> <ul style="list-style-type: none"> • All participating jurisdictions, new or continuing; and • Jurisdictions that no longer participate in the plan. <p>If jurisdictional participation has changed since approval of the previous plan, changes should be discussed in the planning process section of the updated plan.</p>		SUMMARY SCORE

PLANNING PROCESS: §201.6(b): *An open public involvement process is essential to the development of an effective plan.*

4. Documentation of the Planning Process

Requirement §201.6(b): *In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process **shall** include:*

- (1) *An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval;*
- (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*
- (3) *Review and incorporation, if appropriate, of existing plans, studies, reports, and technical information.*

Requirement §201.6(c)(1): *[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.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan provide a narrative description of the process followed to prepare the new or updated plan?	p.25-28	Shall document how the plan was prepared (e.g., the time period to complete the plan, the type & outcome of meetings).		
B. Does the new or updated plan indicate who was involved in the current planning process? (For example, who led the development at the staff level and were there any external contributors such as contractors? Who participated on the plan committee, provided information, reviewed drafts, etc.?)	p.25-28	<p>Shall document who was involved in the planning process (e.g., the composition of the planning team).</p> <p><i>Should</i> document how the planning team was formed and how each party represented contributed to the process. Ideally, the local mitigation planning team is composed of local, State, and Federal agency representatives, as well as community representatives, local business leaders, and educators.</p>		

4. Documentation of the Planning Process

Requirement §201.6(b): In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process **shall** include:

- (1) An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval;
- (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
- (3) Review and incorporation, if appropriate, of existing plans, studies, reports, and technical information.

Requirement §201.6(c)(1): [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.

			SCORE
C. Does the new or updated plan indicate how the public was involved? (Was the public provided an opportunity to comment on the plan during the drafting stage and prior to the plan approval?)	p.25-28	Shall Indicate how the public (residents, businesses, and other interested parties) was given the opportunity to comment on the plan during the drafting stage and prior to plan approval (e.g., public meetings, surveys, Web pages, storefronts, toll-free telephone lines, etc.)	
D. Does the new or updated plan discuss the opportunity for neighboring communities, agencies, businesses, academia, nonprofits, and other interested parties to be involved in the planning process?	p.25-28	Shall Include a discussion of the opportunity provided for neighboring communities, agencies involved in hazard mitigation, and businesses, academia, and other relevant private and non-profit interests.	
E. Does the planning process describe the review and incorporation, if appropriate, of existing plans, studies, reports, and technical information?	p.25-28	Shall describe the review of any existing plans, studies, reports, and technical information and how these are incorporated into the plan.	
F. Does the updated plan document how the planning team reviewed and analyzed each section of the plan and whether each section was revised as part of the update process?	PLAN UPDATE P.27	PLAN UPDATE: The updated plan shall describe the process used to review and analyze each section of the plan (i.e. Planning Process, Risk Assessment, Mitigation Strategy, and Plan Maintenance). If the planning team or committee finds that some sections of the plan warrant an update and others do not, the process used to make that determination must be documented in the plan.	
SUMMARY SCORE			

RISK ASSESSMENT: §201.6(c)(2): *The plan shall include a risk assessment that provides the factual basis for activities proposed in the strategy to reduce losses from identified hazards. Local risk assessments must provide sufficient information to enable the jurisdiction to identify and prioritize appropriate mitigation actions to reduce losses from identified hazards.*

5. Identifying Hazards

Requirement §201.6(c)(2)(i): *[The risk assessment **shall** include a] description of the type ... of all natural hazards that can affect the jurisdiction.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan include a description of the types of all natural hazards that affect the jurisdiction?	p.30-31 PLAN UPDATE: 31	<p>Shall identify and describe the hazards likely to affect the area. It is critical that the plan identify all the natural hazards that can affect the jurisdiction. If the hazard identification omits (without explanation) any hazards commonly recognized as threats to the jurisdiction, this part of the plan cannot receive a "Satisfactory" score.</p> <p>PLAN UPDATE: Therefore, the local risk assessment update shall address any newly identified hazards that have been determined to pose a threat. If improved descriptions of hazards are available, they <i>should</i> be incorporated into this section.</p>		
SUMMARY SCORE				

6. Profiling Hazards

Requirement §201.6(c)(2)(i): *[The risk assessment **shall** include a] description of the ... 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.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the risk assessment identify the location (i.e., geographic area affected) of each natural hazard addressed in the new or updated plan?	p.32-33 PLAN UPDATE: 33	<p>Shall include the location or geographical areas in the community that would be affected.</p> <p><i>Should</i> also identify on a map the areas affected by each identified hazard. Additionally, a composite map (i.e., a map showing combined information from different thematic map layers) <i>should</i> be provided for hazards with a recognizable geographic boundary (i.e., hazards that are known to occur in particular areas of the jurisdiction, such as floods, coastal</p>		

		<p>erosion/storms, wildfires, tsunamis, landslides, subsidence, etc.).</p> <p>PLAN UPDATE: Any maps included in the updated plan must be consistent with the updated information.</p>		
B. Does the risk assessment identify the extent (i.e., magnitude or severity) of each hazard addressed in the new or updated plan?	p.32-33 PLAN UPDATE: 33	<p>Shall include the hazard extent (i.e., magnitude or severity) of potential hazard events. For those hazards not geographically determined, plans shall indicate their applicable intensity.</p> <p><i>Should</i> indicate the recorded intensities of previous events, such as in tornado prone areas. <i>Should</i> be detailed enough to allow identification of the areas of the jurisdiction that are most severely affected by each hazard. <i>Should</i> describe the analysis or sources used to determine the severity or magnitude of future hazard events.</p> <p>PLAN UPDATE: The updated plan shall incorporate any new hazard data related to profiling hazards that describe the extent of hazards.</p>		
C. Does the plan provide information on previous occurrences of each hazard addressed in the new or updated plan?	p.32-33 PLAN UPDATE: 33	<p>Shall include discussion of past occurrences of hazard events in or near the community. NOTE: Look at information at least from last 10 years.</p> <p><i>Should</i> include: Information on the damages that occurred (e.g., costs of recovery, property damage, and lives lost) to the extent practicable; Level of severity (i.e., flood depth or extent, wind speeds, earthquake intensity, etc.); Duration of event and date of occurrence; sources of information used or consulted for assembling a history of past occurrences.</p> <p>PLAN UPDATE: Plan update shall continue to describe occurrences of hazards included in the previously approved plan, <u>and discuss new occurrences of hazard events.</u></p>		
D. Does the plan include the probability of future events (i.e., chance of occurrence) for each hazard addressed in the new or updated plan?	p.32-33 PLAN UPDATE: 33	<p>Shall include probability, likelihood, or frequency that the hazard events would occur in an area.</p> <p><i>Should</i> describe the analysis or sources used to determine the probability, likelihood, or frequency of occurrence.</p> <p>This can be expressed as the % chance/frequency an event will occur each year (i.e. a county may see 2.5 tornadoes per year or have a 30% chance of drought each year—6 in 20 yrs).</p>		

7. Assessing Vulnerability: Overview

Requirement §201.6(c)(2)(ii): [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.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan include an overall summary description of the jurisdiction's vulnerability to each hazard?	p.36-38 PLAN UPDATE: 36	<p>Shall include an overall summary of each hazard.</p> <p>Shall include, by type of hazard, a general description of the types of structures (e.g., buildings, infrastructure, and critical facilities) affected by the hazard.</p> <p>PLAN UPDATE: The vulnerability overview shall describe any changes, clarifications, or refinements to the overview summary described in the previously approved plan.</p>		
B. Does the new or updated plan address the impact of each hazard on the jurisdiction?	p.36-38 PLAN UPDATE: 36	<p>Shall also include a general description of the extent of the hazard's impact to vulnerable structures.</p> <p><i>Should</i> note any data limitations and identify and include in the mitigation strategy actions for obtaining the data necessary to complete and improve future vulnerability assessments.</p> <p>PLAN UPDATE: The updated plan shall continue to include, by hazard, a general description of the types of structures affected by the hazard. If data deficiencies from the risk assessment remain unresolved, the plan must discuss in the mitigation strategy what action will be taken to collect the data for the next update.</p>		

8. Assessing Vulnerability: Addressing Repetitive Loss Properties

Requirement §201.6(c)(2)(ii): [The risk assessment] **must** also address National Flood Insurance Program (NFIP) insured structures that have been repetitively damaged floods.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe vulnerability in terms of the types and numbers of <i>repetitive loss properties</i> located in the identified hazard areas?	p.39-41; PLAN UPDATE: 40	<p>Must address repetitive loss structures in the risk assessment by describing the types (residential, commercial, institutional, etc.) and estimate the numbers of <i>repetitive loss properties</i> located in identified hazard areas.</p> <p><i>Should</i> describe vulnerability in terms of an estimate of the potential dollar losses to repetitive loss properties and a description of the methodology used to prepare the estimate. <i>Should</i> include a map of the floodplain shown on the DFIRM and general area of repetitive loss properties, <u>but not exact address locations</u>.</p>		

SUMMARY SCORE

9. Assessing Vulnerability: Identifying Structures

Requirement §201.6(c)(2)(ii)(A): *The plan should describe vulnerability in terms of the types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard area*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe vulnerability in terms of the types and numbers of existing buildings, infrastructure, and critical facilities located in the identified hazard areas?	p.42-44; PLAN UPDATE: 43	<p><i>Should</i> be based on an inventory of existing buildings, infrastructure, and critical facilities (structures) located within identified hazard area boundaries. Buildings can include residential, commercial, industrial, and municipal buildings; infrastructure, such as roadways, water utilities, and communication systems; and critical facilities, such as shelters and hospitals.</p> <p><i>Should</i> document the process and sources used to identify existing and future structures.</p> <p><i>Should</i> provide information on critical facilities within the identified hazard areas and identify the collection of data for buildings and infrastructure as an action item in the mitigation strategy if data are not readily available for buildings & infrastr.</p>		
B. Does the new or updated plan describe vulnerability in terms of the types and numbers of future buildings, infrastructure, and critical facilities located in	P.42-44 PLAN UPDATE: 43	<i>Should</i> be based on an inventory of proposed buildings, infrastructure, and critical facilities (structures) located within identified hazard area boundaries. Buildings can include		

the identified hazard areas?		residential, commercial, industrial, and municipal buildings; infrastructure, such as roadways, water utilities, and communication systems; and critical facilities, such as shelters and hospitals.		
		<i>Should determine how far into the future they wish to go in considering proposed buildings, infrastructure, and critical facilities, including planned and approved development.</i>		
SUMMARY SCORE				

10. Assessing Vulnerability: Estimating Potential Losses

Requirement §201.6(c)(2)(ii)(B): [The plan **should** describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(ii)(A) of this section and a description of the methodology used to prepare the estimate

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan estimate potential dollar losses to vulnerable structures?	p.45-46; PLAN UPDATE 45-46	<p><i>Should include an estimate of losses for the identified vulnerable structures.</i></p> <p><i>Should include, when resources permit, structure, contents, and function losses to present a full picture of the total loss for each asset. Where data are limited, the planning team can select the most likely event for each hazard and estimate the losses for that event. In this way, the planning team can identify parts of the jurisdiction that could suffer the greatest losses.</i></p> <p><i>Should note any data limitations and identify and include in the implementation strategy actions for obtaining the data to complete and improve future risk assessment analysis efforts.</i></p>		
B. Does the new or updated plan describe the methodology used to prepare the estimate?	p.45-46	<i>Should provide the methodology used to determine losses.</i>		
SUMMARY SCORE				

11. Assessing Vulnerability: Analyzing Development Trends

Requirement §201.6(c)(2)(ii)(C): [The plan **should** describe vulnerability in terms of] 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.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S

A. Does the new or updated plan describe land uses and development trends?	p.47-48 PLAN UPDATE: 47-48	<p><i>Should</i> provide a general overview of land uses and types of development occurring within the community. This can include existing and proposed land uses as well as development densities in the identified hazard areas and any anticipated future changes.</p> <p><i>Should</i> describe vulnerability in terms of providing a general description of land uses and development trends within repetitive loss areas so that mitigation options can be considered in future land use decisions.</p>		
		SUMMARY SCORE		

12. Multi-Jurisdictional Risk Assessment

Requirement §201.6(c)(2)(iii): For multi-jurisdictional plans, the risk assessment **must** assess each jurisdiction's risks where they vary from the risks facing the entire planning area.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan include a risk assessment for each participating jurisdiction as needed to reflect unique or varied risks?	p.50; PLAN UPDATE: 50	<p>Shall present information for the general planning area as a whole.</p> <p>Shall include information for particular jurisdictions for hazard risks and associated losses if they occur in only part of the planning area.</p> <p><i>Should</i> indicate unique construction characteristics among jurisdictions so that appropriate mitigation actions are considered.</p> <p>PLAN UPDATE: If new hazards and risks have been identified in the multi-jurisdictional risk assessment, the information must be attributed to the appropriate jurisdiction(s) or to the whole planning area, whichever applies. Where vulnerability to previously identified hazards has changed, the plan must incorporate this information into the updated multijurisdictional risk assessment and it must be attributed to the appropriate jurisdiction(s) or to the whole planning area, whichever applies.</p>		
		SUMMARY SCORE		

MITIGATION STRATEGY: §201.6(c)(3): *The plan shall include a mitigation strategy 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.*

13. Local Hazard Mitigation Goals

Requirement §201.6(c)(3)(i): *[The hazard mitigation strategy **shall** include a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A Does the new or updated plan include a description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards?	P.53 PLAN UPDATE: 53	<p>Shall list the goals intended to reduce or avoid the effects of the identified hazards addressed in the risk assessment</p> <p><i>Should</i> include how goals were developed. <i>Should</i> also be compatible with the goals of the community as expressed in other community plan documents. <i>Should</i> be based on the findings of the local and State risk assessments. <i>Should</i> represent a long-term vision for hazard reduction or enhancement of mitigation capabilities.</p> <p>PLAN UPDATE: It is not necessary to change goals from the previous plan if they remain valid; however, the plan must document that goals were re-evaluated and that they were determined to remain valid and effective. If the previously approved plan included objectives, the updated plan <i>should</i> document which objectives have been met, and identify new objectives.</p>		
SUMMARY SCORE				

14. Identification and Analysis of Mitigation Actions

Requirement §201.6(c)(3)(ii): *[The 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.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan identify and analyze a comprehensive range of specific mitigation actions and projects for each hazard?	p.56-59; PLAN UPDATE: 58	Shall list a range of actions that work towards reducing vulnerability identified in the risk/vulnerability assessment and evaluate such actions that achieve the community's goals and objectives to reduce or avoid the effects of the identified hazards.		

		<p><i>Should</i> describe the process by which the community decides on particular mitigation actions. This description can include who participated in the evaluation and selection of actions.</p> <p>PLAN UPDATE: The plan update provides an opportunity for local jurisdictions to reconsider the range of specific actions. If the mitigation actions or activities remain unchanged from the previously approved plan the updated plan should indicate why changes are not necessary.</p>		
B. Do the identified actions and projects address reducing the effects of hazards on new buildings and infrastructure?	p.56-59; PLAN UPDATE: 58	<p>Shall address new buildings and infrastructure. <u>Examples include:</u> government, administrative or regulatory actions, planning/zoning, open space preservation, stormwater management regulations, forest/vegetation management, other ordinances, etc.</p>		
C. Do the identified actions and projects address reducing the effects of hazards on existing buildings and infrastructure?	p.56-59; PLAN UPDATE: 58	<p>Shall address existing buildings and infrastructure. <u>Examples include:</u> Acquisition, elevation, relocation, structural retrofits, floodproofing, safe rooms, stormwater controls, floodwalls, buried utilities, snowfences, etc.</p>		
SUMMARY SCORE				

15. Identification and Analysis of Mitigation Actions: National Flood Insurance Program (NFIP) Compliance

Requirement: §201.6(c)(3)(ii): [The mitigation strategy] must also address the jurisdiction's participation in the National Flood Insurance Program (NFIP), and continued compliance with NFIP requirements, as appropriate.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe the jurisdiction (s) participation in the NFIP?	p.61-62 PLAN UPDATE: 62	<p>Must describe each jurisdiction's participation in the NFIP. Jurisdictions that are currently not participating in the NFIP may meet this requirement by describing the reasons why the community does not participate, particularly where a FHBM or FIRM has been issued.</p> <p>PLAN UPDATE: The updated plan must describe each jurisdiction's participation in the NFIP, including any changes since the previously approved plan was adopted.</p>		
B. Does the mitigation strategy identify, analyze and prioritize actions related to continued compliance with the NFIP?	p.61-62 PLAN UPDATE: 62	Must identify, analyze and prioritize actions related to continued compliance with the NFIP. Simply stating an action such as, "The community will continue to comply with NFIP," will <u>not</u> meet this requirement.		

		PLAN UPDATE: Updated plan must identify, analyze and prioritize actions related to continued compliance with the NFIP.		
		SUMMARY SCORE		

16. Implementation of Mitigation Actions

Requirement: §201.6(c)(3)(iii): [The mitigation strategy section **shall** include] an action plan describing how the actions identified in section (c)(3)(ii) 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.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated mitigation strategy include how the actions are prioritized ? (For example, is there a discussion of the process and criteria used?)	P.63-64	Shall describe the method for prioritizing the order in which actions will be implemented. Considerations that may be used to prioritize actions include: social impact, technical feasibility, administrative capabilities, and political and legal effects, as well as environmental issues.		
B. Does the new or updated mitigation strategy address how the actions will be implemented and administered, including the responsible department, existing and potential resources and the timeframe to complete each action?	P.63-64 PLAN UPDATE: p.63	Shall also include how actions will be implemented and administered. Shall include the agency or personnel responsible for carrying out the actions, the funding sources, and the implementation timeline. NOTE: Project timelines in Plan Updates need to reflect current timeframes and <u>not</u> timeframes from the previous plan. <i>Should</i> also include a cost estimate or budget for each action, when available.		
C. Does the new or updated prioritization process include an emphasis on the use of a cost-benefit review to maximize benefits?	P.63-64	Shall consider the benefits that would result from the mitigation actions (including projects) versus the cost of those actions. Does not require a cost-benefit analysis for actions. The requirement of 44 CFR 201.6 (c)(3)(iii) is met as long as the economic considerations are summarized in the plan as part of the community's analysis of "the comprehensive range of specific mitigation actions and projects being considered ..." More info can be gleaned from "Using Benefit-Cost Review		

		in Mitigation Planning (FEMA 386-5)"		
D. Does the updated plan identify the completed, deleted or deferred mitigation actions as a benchmark for progress, and if activities are unchanged (<i>i.e.</i> , deferred), does the updated plan describe why no changes occurred?	PLAN UPDATE: P.64	PLAN UPDATE: Updated plan must identify the county's (<i>or primary jurisdiction's</i>) completed, deleted, or deferred actions or activities from the previously approved plan as a benchmark for progress. If the mitigation actions or activities remain unchanged from the previously approved plan, the updated plan must indicate why changes are not necessary. Further, the updated plan shall include in its prioritization any new mitigation actions identified since the previous plan was approved or through the plan update process.		
SUMMARY SCORE				

17. Multi-Jurisdictional Mitigation Actions

Requirement §201.6(c)(3)(iv): For multi-jurisdictional plans, there **must** be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A Does the new or updated plan include identifiable action items for each jurisdiction requesting FEMA approval of the plan?	P.65	<p>Shall contain a section that links the proposed mitigation actions to the applicable jurisdictions</p> <p>Shall be able to point to at least one specific action to be pursued for any jurisdiction within the planning area requesting approval or credit for the Mitigation Plan. Actions by individual jurisdictions may be part of or contribute to an area-wide mitigation action. The scope of this action may be entirely within the jurisdiction or may be part of a larger action involving some or all of the other jurisdictions covered in the plan.</p>		
B. Does the updated plan identify the completed, deleted or deferred mitigation actions as a benchmark for progress, and if activities are unchanged (<i>i.e.</i> , deferred), does the updated plan describe why no changes occurred?	P.65 – PLAN UPDATE	<p>PLAN UPDATE: The updated multi-jurisdictional plan must identify the completed, deleted, or deferred actions from the <i>multiple jurisdictions</i> included the previously approved plan as a benchmark for progress. Further, the updated plan shall include any new mitigation actions identified in its evaluation and prioritization since the previous plan was approved or through the plan update process.</p> <p>If the mitigation actions remain unchanged from the</p>		

		previously approved plan, the updated plan must indicate why changes are not necessary.		
		SUMMARY SCORE		

PLAN MAINTENANCE PROCESS

18. Monitoring, Evaluating, and Updating the Plan

Requirement §201.6(c)(4)(i): [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.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe the method and schedule for monitoring the plan, including the responsible department?	P.67-69; PLAN UPDATE: 69	<p>Shall describe the how, when, and by whom the plan will be monitored.</p> <p>Monitoring <i>may</i> include periodic reports by agencies involved in implementing projects or activities; site visits, phone calls, and meetings conducted by the person responsible for overseeing the plan; and the preparation of an annual report that captures the highlights of the previously mentioned activities.</p> <p>PLAN UPDATE: The updated plan must include the method and schedule to be used over the next five years for monitoring the plan.</p>		
B. Does the new or updated plan describe the method and schedule for evaluating the plan, including how, when and by whom (<i>i.e.</i> the responsible department)?	P.67-69 PLAN UPDATE: 69	<p>Shall also include a description of how, when, and by whom the plan will be evaluated.</p> <p><i>Should</i> include the criteria used to evaluate the plan.</p> <p>Should assess, among other things, whether: the goals and objectives address current and expected conditions; the nature, magnitude, and/or type of risks has changed; the current resources are appropriate for implementing the plan; there are implementation problems, such as technical, political, legal, or coordination issues with other agencies; the outcomes have occurred as expected; the agencies and other partners participated as originally proposed.</p> <p>PLAN UPDATE: As a part of the planning process, the community reviews and analyzes the previously</p>		

		approved plan's method and schedule for monitoring and updating the plan, such as strengths and weaknesses and what elements, if any, have changed. The updated plan must include the method and schedule to be used over the next five years to evaluate the plan.		
C. Does the new or updated plan describe the method and schedule for updating the plan within the five-year cycle?	P.67-69; PLAN UPDATE: 69	Shall describe how, when, and by whom the plan will be updated. The Rule requires that the plan be updated within five years from the date of FEMA approval. FEMA recommends that the plan be reviewed and updated on an annual basis to determine the effectiveness of programs, and to reflect changes in land development or programs that may affect mitigation priorities. PLAN UPDATE: The updated plan must include the method and schedule to be used over the next five years to update the plan.		
SUMMARY SCORE				

19. Incorporation into Existing Planning Mechanisms

Requirement §201.6(c)(4)(ii): [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 improvement plans, when appropriate.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan identify other local planning mechanisms available for incorporating the mitigation requirements of the mitigation plan?	P.70-72; PLAN UPDATE: 72	Shall identify other local planning mechanisms available for incorporating the requirements of the mitigation plan. NOTE: Such plans that can relate to mitigation include Local comprehensive plans, land use plans, capital improvement plans, transportation plans, Local Emergency Response plans, EOPs, evacuation plans, zoning ordinances, stormwater mgmt plans, mutual aid agreements, threat assessments, etc.		
B. Does the new or updated plan include a process by which the local government will incorporate the mitigation strategy and other information contained in the plan (e.g., risk assessment) into other planning mechanisms, when appropriate?	P.70-72; PLAN UPDATE 72	Shall indicate how mitigation recommendations will be incorporated into comprehensive plans, capital improvement plans, zoning and building codes, etc (see "A: above for additional potential types of plans)		

C. Does the updated plan explain how the local government incorporated the mitigation strategy and other information contained in the plan (e.g., risk assessment) into other planning mechanisms, when appropriate?	P.70-72; PLAN UPDATE: 72	PLAN UPDATE: The updated plan must explain how the local government incorporated the mitigation plan into other planning mechanisms, when appropriate, as a demonstration of progress in local mitigation efforts. If the plan was NOT incorporated into other plans as suggested in the original plan, this must be noted in the current updated plan.		
		SUMMARY SCORE		

Continued Public Involvement

Requirement §201.6(c)(4)(iii): [The plan maintenance process **shall** include a] discussion on how the community will continue public participation in the plan maintenance process.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan explain how continued public participation will be obtained? (For example, will there be public notices, an on-going mitigation plan committee, or annual review meetings with stakeholders?)		<p>Shall describe what opportunities the broader public (i.e., stakeholders who are not on the planning team) would have during the plan's periodic review to comment on the progress made to date and the proposed plan revisions.</p> <p>Should describe the mechanisms for keeping the public involved (e.g., holding public meetings, posting proposed changes to the plan on the Web, etc.)</p>		
		SUMMARY SCORE		