

DEC 02 2016

U.S. Department of Homeland Security  
Region V  
536 South Clark Street, Floor 6  
Chicago, IL 60605



**FEMA**

Brian M. Satula  
Administrator  
Wisconsin Emergency Management  
2400 Wright Street, P.O. Box 7865  
Madison, Wisconsin 53707-7865

Dear Mr. Satula:

I am pleased to inform you that the Federal Emergency Management Agency (FEMA), within the Department of Homeland Security (DHS), formally approves the State of Wisconsin Hazard Mitigation Plan update for 2016, officially adopted by the State of Wisconsin. The plan is now in compliance with the Disaster Mitigation Act of 2000 requirements for an updated Standard State Mitigation Plan and the requirements for an updated Enhanced State Hazard Mitigation Plan.

The approval of this plan ensures the continued availability of non-emergency Stafford Act funding for the next 5 years within the State of Wisconsin. This includes the Pre-Disaster Mitigation Program, Flood Mitigation Assistance Program, Hazard Mitigation Grant Program (at an increased 20% level), Fire Management Assistance Grant Program, and Public Assistance Grants (Categories C-G). In addition the approval of this plan allows the State of Wisconsin to be eligible for the reduced cost share (90/10) for grants awarded under the Flood Mitigation Assistance Program. All requests for funding however, will be evaluated individually according to the specific eligibility and other requirements of the particular program under which the application is submitted.

If you have any questions regarding this planning process, please contact Christine Stack, Mitigation Division Director, at 312-408-5570 or [christine.stack@fema.dhs.gov](mailto:christine.stack@fema.dhs.gov).

Sincerely,

A handwritten signature in blue ink that reads "Janet M. Odesho".

Janet M. Odesho  
Acting Regional Administrator

## B.1 Plan Review Tool Summary

<b>State:</b> Wisconsin	<b>Title and Date of Plan:</b> WI State Mitigation Plan 2016	<b>Date of Submission:</b> Full Draft Submitted by November 30, 2016
<b>State Point of Contact (Name / Title):</b> Katie Sommers, State Hazard Mitigation Officer		
<b>Address:</b> 2400 Wright St., Madison, WI, 53707		
<b>Agency:</b> Wisconsin Emergency Management Agency		
<b>Phone Number:</b> (608) 242-3222	<b>E-Mail:</b> Katie.Sommers@wisconsin.gov	

<b>Date Received in FEMA Region:</b> Full Draft Received by November 30, 2016	
<b>FEMA Reviewer (Planning – Name / Title):</b> Christine Meissner, Mitigation Planner	<b>Date:</b> 12/02/2016
<b>FEMA Reviewer (HMA – Name / Title):</b> Kaylie Alderman, Hazard Mitigation Officer	<b>Date:</b> 11/30/2016
<b>FEMA Reviewer (Name / Title):</b> Cathleen Carlisle, Mitigation Planner, HQ	<b>Date:</b> 11/15/2016
<b>FEMA Reviewer (Name / Title):</b> Lilah Haxton, HMA Emergency Management Specialist, HQ	<b>Date:</b> 12/01/2016
<b>FEMA Approver (Name / Title):</b> Janet M. Odeshoo, Acting Regional Administrator	<b>Date:</b> 12/02/2016
<b>Plan Status (Not Approved, Approvable Pending Adoption, Approved):</b> Approved	<b>Date:</b> 12/02/2016

SUMMARY	YES	NO
<b>STANDARD STATE MITIGATION PLAN</b>		
Does the plan meet the standard state mitigation plan requirements?	X	
<b>REPETITIVE LOSS STRATEGY</b>		
Does the plan include a Repetitive Loss Strategy? [see S6 / RL1; S8 / RL2; S9 / RL3; S10 / RL4; S13 / RL5; and S15 / RL6]	X	
<b>ENHANCED STATE MITIGATION PLAN</b>		
Does the plan meet the enhanced state mitigation plan requirements?	X	

## B.2 Standard State Mitigation Plan Regulation Checklist

REGULATION CHECKLIST – STANDARD PLAN	Location in Plan	M / NM*
<b>*M=Met; NM=Not Met</b>		
<b>STANDARD (S) STATE MITIGATION PLAN</b>		
<b>Planning Process</b>		
S1. Does the plan describe the planning process used to develop the plan? [44 CFR §§201.4(b) and (c)(1)]	Section 2	M
S2. Does the plan describe how the state coordinated with other agencies and stakeholders? [44 CFR §§201.4(b) and (c)(1)]	Section 2	M
<b>Required Revisions:</b>		
<b>Hazard Identification and Risk Assessment</b>		
S3. Does the risk assessment include an overview of the type and location of all natural hazards that can affect the state? [44 CFR §201.4(c)(2)(i)]	Appendix A	M
S4. Does the risk assessment provide an overview of the probabilities of future hazard events? [44 CFR §201.4(c)(2)(i)]	Appendix A	M
S5. Does the risk assessment address the vulnerability of state assets located in hazard areas and estimate the potential dollar losses to these assets? [44 CFR §§201.4(c)(2)(ii) and 201.4(c)(2)(iii)]	Appendix A	M
S6. Does the risk assessment include an overview and analysis of the vulnerability of jurisdictions to the identified hazards and the potential losses to vulnerable structures? [44 CFR §§201.4(c)(2)(ii) and 201.4(c)(2)(iii)]	Appendix A and Appendix E	M
S7. Was the risk assessment revised to reflect changes in development? [44 CFR §201.4(d)]	Appendix A	M
<b>Required Revisions:</b>		
<b>Mitigation Strategy and Priorities</b>		
S8. Does the mitigation strategy include goals to reduce / avoid long-term vulnerabilities from the identified hazards? [44 CFR §201.4(c)(3)(i)]	Section 3 (Part 3.1)	M
S9. Does the plan prioritize mitigation actions to reduce vulnerabilities identified in the risk assessment? [44 CFR §§201.4(c)(3)(iii) and (iv)]	Section 3	M
S10. Does the plan identify current and potential sources of funding to implement mitigation actions and activities? [44 CFR §201.4(c)(3)(iv)]	Section 3	M
S11. Was the plan updated to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities? [44 CFR §201.4(d)]	Section 3	M
<b>Required Revisions:</b>		
<b>State Mitigation Capabilities</b>		
S12. Does the plan discuss the evaluation of the state’s hazard management policies, programs, capabilities, and funding sources to mitigate the hazards identified in the risk assessment? [44 CFR §201.4(c)(3)(ii)]	Section 3 (Part 3.2.1) and Section 6	M
<b>Required Revisions:</b>		

<b>REGULATION CHECKLIST – STANDARD PLAN</b>		<b>Location in Plan</b>	<b>M / NM*</b>
<b>*M=Met; NM=Not Met</b>			
<b>Local Coordination and Mitigation Capabilities</b>			
S13. Does the plan generally describe and analyze the effectiveness of local and tribal, as applicable, mitigation policies, programs, and capabilities? [44 CFR §201.4(c)(3)(ii)]	Section 4	M	
S14. Does the plan describe the process to support the development of approvable local and tribal, as applicable, mitigation plans? [44 CFR §§201.3(c)(5) and 201.4(c)(4)(i)]	Section 4	M	
S15. Does the plan describe the criteria for prioritizing funding? [44 CFR §201.4(c)(4)(iii)]	Section 4	M	
S16. Does the plan describe the process and timeframe to review, coordinate and link local and tribal, as applicable, mitigation plans with the state mitigation plan? [44 CFR §§201.3(c)(6), 201.4(c)(2)(ii), 201.4(c)(3)(iii), and 201.4(c)(4)(ii)]	Section 4	M	
<b>Required Revisions:</b>			
<b>Plan Review, Evaluation, and Implementation</b>			
S17. Is there a description of the method and schedule for keeping the plan current? [44 CFR §§201.4(c)(5)(i) and 201.4(d)]	Section 5	M	
S18. Does the plan describe the systems for monitoring implementation and reviewing progress? [44 CFR §§201.4(c)(5)(ii) and 201.4(c)(5)(iii)]	Section 5	M	
<b>Required Revisions:</b>			
<b>Adoption and Assurances</b>			
S19. Did the state provide documentation that the plan has been formally adopted? [44 CFR §201.4(c)(6)]	Appendix L	M	
S20. Did the state provide assurances? [44 CFR §201.4(c)(7)]	Section 1	M	
<b>Required Revisions:</b>			
<b>Repetitive Loss (RL) Strategy</b>			
RL1. Did Element S6 (risk assessment) address RL and SRL properties? [44 CFR §§201.4(c)(2)(ii), 201.4(c)(2)(iii), and 201.4(c)(3)(v)]	Appendix E	M	
RL2. Did Element S8 (mitigation goals) address RL and SRL properties? [44 CFR §§201.4(c)(3)(i) and 201.4(c)(3)(v)]	Appendix E	M	
RL3. Did Element S9 (mitigation actions) address RL and SRL properties? [44 CFR §§201.4(c)(3)(iii) and 201.4(c)(3)(v)]	Appendix E	M	
RL4. Did Element S10 (funding sources) address RL and SRL properties? [44 CFR §§201.4(c)(3)(iv) and 201.4(c)(3)(v)]	Appendix E	M	
RL5. Did Element S13 (local and tribal, as applicable, capabilities) address RL and SRL properties? [44 CFR §§201.4(c)(3)(ii) and	Appendix E	M	
RL6. Did Element S15 (prioritizing funding) address RL and SRL properties? [44 CFR §§201.4(c)(4)(iii) and 201.4(c)(3)(v)]	Appendix E	M	
<b>Required Revisions:</b>			

**B.3 Enhanced State Mitigation Plan Regulation Checklist**

REGULATION CHECKLIST – ENHANCED PLAN	Location in Plan	M / NM*
*M=Met; NM=Not Met		
<b>ENHANCED (E) STATE MITIGATION PLAN</b>		
<b>Meet Standard State Mitigation Plan Elements</b>		
E1. Does the Enhanced plan include all elements of the standard state mitigation plan? [44 CFR §201.5(b)]	Section 2, Appendix A, Section 3, Section 4, Section 5, Appendix E,	M
<b>Required Revisions:</b>		
<b>Integrated Planning</b>		
E2. Does the plan demonstrate integration to the extent practicable with other state and/or regional planning initiatives and FEMA mitigation programs and initiatives? [44 CFR §201.5(b)(1)]	Section 6 (Parts 6.1, 6.2, 6.6, and 6.8	M
<b>Required Revisions:</b>		
<b>State Mitigation Capabilities</b>		
E3. Does the state demonstrate commitment to a comprehensive mitigation program? [44 CFR §201.5(b)(4)]	Section 6 (Part 6.8)	M
E4. Does the enhanced plan document capability to implement mitigation actions? [44 CFR §§201.5(b)(2)(i), 201.5(b)(2)(ii), and 201.5(b)(2)(iv)]	Section 6 (Part 6.3)	M
E5. Is the state effectively using existing mitigation programs to achieve mitigation goals? [44 CFR §201.5(b)(3)]	Sections 6 (Parts 6.5 and 6.7)	M
<b>Required Revisions:</b>		
<b>HMA Grants Management Performance</b>		
E6. With regard to HMA, is the state maintaining the capability to meet application timeframes and submitting complete project applications? [44 CFR §201.5(b)(2)(iii)(A)]	Section 6.4	M
E7. With regard to HMA, is the state maintaining the capability to prepare and submit accurate environmental reviews and benefit-cost analyses? [44 CFR §201.5(b)(2)(iii)(B)]	Section 6 (Parts 6.4.1 and 6.4.2)	M
E8. With regard to HMA, is the state maintaining the capability to submit complete and accurate quarterly progress and financial reports on time? [44 CFR §201.5(b)(2)(iii)(C)]	Section 6 (Part 6.4.3)	M
E9. With regard to HMA, is the state maintaining the capability to complete HMA projects within established performance periods, including financial reconciliation? [44 CFR §201.5(b)(2)(iii)(D)]	Section 6 (Part 6.4.4)	M
<b>Required Revisions:</b>		

**B.4 Strengths and Opportunities for Improvement**

**STRENGTHS AND OPPORTUNITIES FOR IMPROVEMENT**

**INSTRUCTIONS:** The purpose of the “Strengths and Opportunities for Improvement” section is for FEMA to provide more comprehensive feedback on the state mitigation plan to help the state advance mitigation planning. The intended audience is the state staff responsible for the mitigation plan update. FEMA will address the following topics:

1. Plan strengths, including specific sections in the plan that are above and beyond the minimum requirements; and
2. Suggestions for future improvements.

FEMA will provide feedback and include examples of best practices, when possible, as part of the *Plan Review Tool*, or, if necessary, as a separate document. The state mitigation plan elements are included below in italics for reference but should be deleted as the narrative summary is completed. FEMA is not required to provide feedback for each element.

Required revisions from the **Regulation Checklist** are not documented in the **Strengths and Opportunities for Improvement** section.

Results from the **Strengths and Opportunities for Improvement** section are not required for Plan Approval, but may inform discussions during the Program Consultation.

**Describe the mitigation plan strengths, including areas that may exceed minimum requirements, and describe areas for future improvements to the mitigation plan.**

➤ **Hazard Identification and Risk Assessment**

- ✓ To reduce redundancies and align with EMAP recommendations, the state integrated the THIRA into the state mitigation plan. The THIRA is included as an appendix to the state plan and serves as the required natural hazard risk assessment section.
- ✓ The state used a new methodology in place of HAZUS for the 2016 plan update-- newly-developed statewide parcel data and SFHA data were used to determine the value of improved structures located on parcels that are at least partially located in the SFHA for each county. The state acknowledges that the parcel information for flood risk is not conclusive and should develop a method of tracking vulnerable assets from the risk assessments of local mitigation plans to supplement this information.
- ✓ A recommendation from the 2011 state plan review tool was for the state to incorporate more demographic and land use information into the risk analysis. For the 2016 plan update, the statewide parcel inventory used in the risk assessment reflects the most up-to-date information on development patterns in the state. The state also incorporated heat vulnerability index maps into the risk assessment for extreme heat. It is recommended the state continue to include additional detail related to land development in the most densely populated areas and continue to work with state partners on incorporating data into the state plan that conveys risk in the most populated areas and for the most vulnerable populations in the state.
- ✓ The state greatly scaled up climate change information since the previous plan iteration, including best available data developed through WICCI, and consulted with NRDC to include climate change-oriented mitigation actions. It is recommended the state continue in this trajectory and work with WICCI to provide meaningful regional interpretations of the data (the downscaled data shows regional variations

in temperature and precipitation changes around the state over the past 50 years) so local and tribal communities can use that information to inform their local and tribal mitigation plans.

- ✓ A recommendation from the 2011 state review tool was for the state to continue to improve its risk assessment of state-owned facilities. For the 2016 plan, WEM obtained a much more comprehensive list of state-owned buildings from the Department of Administration and included PA data to convey risk through previous damage. The state plan should continue to document the impacts to state facilities and critical infrastructure by analyzing damage and impacts from previous major disasters.
- ✓ Resource: *State Mitigation Planning Key Topics Bulletin: Risk Assessment*  
[https://www.fema.gov/media-library-data/1464972786707-d686a56e54284eb815b1624224dfaa5b/RiskAssessment\\_KeyTopics\\_Bulletin\\_Final.pdf](https://www.fema.gov/media-library-data/1464972786707-d686a56e54284eb815b1624224dfaa5b/RiskAssessment_KeyTopics_Bulletin_Final.pdf)

➤ **Mitigation Strategy**

- ✓ The state plan goals for 2016 were updated to reflect the expanded risk assessment (THIRA), which also covers manmade and technological hazards. There was a significant increase in the amount of mitigation actions for the 2016 state plan update (41 new actions). Almost every participating lead agency identified new actions to implement over the next 5 years. Some of the long-term actions carried over from previous plan iterations do not have an action update summary or the plan simply states ‘status unchanged’—every action should have a summary of progress made.
- ✓ WDOT is planning a statewide assessment and inventory of culverts, this type of information is valuable for state and local mitigation planning. FEMA’s PA data indicates that more than 50% of the costs of natural disasters in Wisconsin are associated with the rebuilding of roads and bridges. It is recommended the state agencies continue to coordinate and share vulnerability data related to roads and outreach to local road commissions and public works departments responsible for roads.
- ✓ Due to time constraints the REC appendix was not included in the 2016 state plan update but the state indicates they will maintain and update a separate document related to risk and mitigation actions of electric utilities. It is recommended the state expand their outreach to water and wastewater utilities as well. According to FEMA’s PA data, sewage treatment facilities, water treatment plants, and water pumping stations are vulnerable to hazards such as flooding and erosion.  
<https://www.epa.gov/sites/production/files/2016-08/documents/160815-hazardmitigationfornaturaldisasters.pdf>
- ✓ The state acknowledges in Section 5 that monitoring plan implementation and tracking progress made can sometimes be inconsistent throughout the 5 year lifecycle of the plan. The state and FEMA will use annual consultation meetings as a platform for tracking implementation of the state plan. It is also recommended the state work with their WSJHMT partners to develop a tracking method for mitigation actions that is consistent and ideally draws from tracking methods states are already using to monitor their programmatic activities. Since the state meets with their WSJHMT team twice a year (or as needed), a quarterly progress reporting system could be established.
- ✓ Resource: *State Mitigation Planning Key Topics Bulletin: Mitigation Strategy*  
[https://www.fema.gov/media-library-data/1478260600306-117bda8ab179bd301b0b61b52a143485/StateMitigationPlanning\\_MS\\_Bulletin\\_V9\\_508.pdf](https://www.fema.gov/media-library-data/1478260600306-117bda8ab179bd301b0b61b52a143485/StateMitigationPlanning_MS_Bulletin_V9_508.pdf)

➤ **State Capability and Comprehensive Programming**

- ✓ The state has a sustained, proven commitment to hazard mitigation and as such is designated as an enhanced state. With respect to integrated planning and comprehensive programming, this is demonstrated through the states coordination structures and inter-agency programming and initiatives



(ex-W SJHMT, the various task force, committees and work groups, and public-private partnerships discussed in Section 6). An organizational recommendation for future plan updates: because of the state's long history with mitigation, it is increasingly difficult to tease out the information that is relevant to just the last 5 years of the plan's lifecycle. The state may want to consider an appendix for Past Accomplishments to maintain 'institutional memory' of progress made.

- ✓ WEM demonstrates robust state coordination-- from the initial formation of the IDRG in 1993 and SHMT in 2000 to the establishment of the WHMT in 2003. The WHMT is now called the WSJHMT but is a change in name only, WI was successfully leading a state-led, interagency group prior to the development of SJ charters across the country. WEM continues to integrate WSJHMT into other coordination mechanisms, most recently state agencies of WSJHMT also serve as chairs to the RSF committees, serving this dual role enhances communication and information sharing across recovery and mitigation sectors of emergency management. It is clear the state has recruited a diverse membership of state agencies to the WSJHMT that represent cross-sector expertise.
- ✓ The state plan update does a good job in identifying the existing programs, policies, regulations, plans and initiatives of state agencies that address natural hazards and support mitigation. The table included in Section 3 discusses how the program/policy/plan addresses mitigation and identifies the gaps and unmet needs of each. It is recommended moving forward that the WSJHMT consider these unmet needs as they develop new mitigation actions (if it is within their authority and ability to address these unmet needs).
- ✓ The plan includes a valuable description of the WDNR's RiskMAP efforts. WEM has been an active partner in the RiskMAP meetings and we encourage the state planning team to continue this commitment.
- ✓ Resource: *State Mitigation Planning Key Topics Bulletin: Mitigation Capabilities*  
[https://www.fema.gov/media-library-data/1474922239359-986b9b410443b41d944df0165dcafc79/MitCapabilities\\_KeyTopics\\_Bulletin\\_508.pdf](https://www.fema.gov/media-library-data/1474922239359-986b9b410443b41d944df0165dcafc79/MitCapabilities_KeyTopics_Bulletin_508.pdf)
- ✓ Resource: *State Mitigation Planning Key Topics Bulletin: Planning Process*  
[https://www.fema.gov/media-library-data/1468867403587-36535211c7c892fb7b1956e961d05a49/PlanningProcess\\_KeyTopics\\_Bulletin\\_508.pdf](https://www.fema.gov/media-library-data/1468867403587-36535211c7c892fb7b1956e961d05a49/PlanningProcess_KeyTopics_Bulletin_508.pdf)

➤ **HMA Grants Management Performance**

The comments below are specific to project activity over the last four quarters, which references the following projects: DR-1933-Uncommitted Funds Pilot (1933.8 Glenddale, 1933.222 Lisbon, 1933.41 Jefferson) and FY16 PDM/FMA (PDM Ozaukee Acquisition, PDM River Falls Safe Room, FMA Pepin Acquisition)

- ✓ Wisconsin has the capability to meet application time frames and submit eligible, complete applications with clear Scopes of Work. All applications in the past four quarters were submitted prior to the application deadline and entered into their respective tracking systems (eGrants and NEMIS). The applications included all required documentation, including eligibility and completeness checklists. Any requests for information from FEMA were minor and the state responded within the requested timeframe. All applications were determined to be complete within 90 days of submission (the three Uncommitted Funds Pilot projects were complete within 30 days of submission).
- ✓ Wisconsin has the capability to prepare and submit environmental reviews and BCAs. The past four quarters, all BCA documentation and EHP consultation requests were submitted either with the application or within 90 days of the deadline. Wisconsin coordinates with the Regional Environmental Officer to front load the EHP process to make sure that all EHP consultations and requirements are



completed in a timely manner; they are also working closely with the Region on development of a Section 106 Programmatic Agreement. Participation in related training activities this past year include: Climate Resilient Mitigation Activities webinar (March 2016); BCA for Drought and Ecosystems Services webinar, (May 2016); Annual Archaeology Consultant workshop (March 2016); EHP Directive webinar (October 2016)

- ✓ Wisconsin uses a reimbursement system for about 95% of financial transactions. In some cases of extra-ordinary circumstance, the state will advance the money, typically to smaller communities, based on prior approval of the state. The sub-grantee will be advised to deposit any advance HMGP funds into a separate non-interest bearing bank account. If any interest is generated, the sub-grantee will be instructed that those funds shall be expended for project administrative purposes before any additional project funds are drawn down.
- ✓ Wisconsin consistently submits QPRs on time and completes all grant close-out activities within the 90 day liquidation period after the period of performance ends. The past four quarters Wisconsin submitted detailed QPRs that accurately described the progress of each open sub-grant. The state completed all work on sub-grants prior to the end of the POP. If a POP extension was needed, the request was submitted prior to the required 60 day deadline.
- ✓ Closeout packets were timely, orderly and aligned with the SOW and EHP requirements. Acquisition closeouts identified each acquired property and the reimbursement spreadsheets showed which quarter each draw down occurred and which line item the cost was attributed too. The state submitted SF-425s on time, within 90 days from the end of the performance period, unless FEMA granted an extension. All de-obligations were submitted with or prior to close out of the grant.
- ✓ Based on the most recent monitoring visit to Wisconsin in May of 2015, the state consistently complied with the Financial Management standard requirements outlined in 44CFR Part 13 and demonstrated that actual expenditures are being documented and are consistent with the SF-424.
- ✓ Based on an audit performed in 2015, the A-133 report did not contain any major findings related to HMA programs.

➤ **Local (and Tribal) Coordination and Mitigation Capabilities**

- ✓ The state included an analysis of local hazard mitigation plans that either reference or integrate climate change, a great addition to Section 4. FEMA hopes the state will use this analysis to solicit CRMA applications from those communities. Starting with counties/municipalities that have a demonstrated interest and/or political will to address climate change would be a great place to start with these new PDM/FMA funding priorities.
- ✓ The state has a demonstrated commitment to local planning-- providing annual technical assistance workshops and resources to locals to develop mitigation plans. It is recommended for the state to analyze planning trends and assess whether communities that consistently update their mitigation plans are applying for HMA funds to implement the plan. If there is a gap between producing a plan and producing an application to implement the plan, this may indicate local capacity gaps that would warrant additional technical assistance. As a WSJHMT partner, what role could UW-Extension have in providing capacity-building support to local communities through their subject matter expertise and community programming?
- ✓ The state plan highlights integration with the Department of Administration's comprehensive planning program in Section 6, how does the state want to see this coordination continue in the next 5 years? In Adams County, Colorado the county's comprehensive plan is a full-integration of the mitigation plan (i.e. not separate stand-alone documents). Perhaps there is an opportunity for the state to promote

comprehensive plan and mitigation plan integration in WI where communities can apply for HMA planning grants to finance portions of the comprehensive plans that relate to the requirements for a hazard mitigation plan.

<https://www.adcogov.org/sites/default/files/2012%20Comprehensive%20Plan.pdf>

- ✓ Wisconsin has been a leader in supporting the development of tribal hazard mitigation plans. It is recommended the state continue to work with tribal communities on plan development and provide technical assistance for submission of eligible HMA applications for plan implementation.

➤ **Additional Comments**

- ✓ Per planning guidance and regulations, FEMA will review a state plan within 45 days of receipt from the state (when possible). For the 2016 WI state plan update, a complete draft was not provided to FEMA 45 days prior to the 2011 state plan expiration. While FEMA and the state ultimately coordinated a review procedure that would ensure there would be no lapse in plan coverage, it is expected for future updates that a complete draft is submitted in a timely matter that allows for meaningful feedback and data considerations.