New and Improved: Mitigation Planning Products
For Preparing and Reviewing State, Tribal and Local Plans

Concurrent Session
ASFPM 2013

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Objectives

- Discuss Local, State, and Tribal updates with respect to:
  - Mitigation Plan Review Tool - replaces the Mitigation Plan Review Crosswalk.
  - Mitigation Planning Handbook - assists plan developers in preparing or updating a mitigation plan.

- Identify specific differences and nuances between the State, Tribal and Local Plan Review Tool and Guide

- Familiarize stakeholders with training opportunities
Mitigation Plan Review Process – Background

- Communities often found the guidance and crosswalk difficult to understand and interpret
- Guidance and crosswalk did not facilitate the development of linkages between the risk assessment and mitigation strategy
- Plan development and reviews were often perceived as inconsistent with subjective interpretation across regions
- Planning requirements did not accommodate various levels of community capacity
Mitigation Plan Review Process – Project Solutions

- Local Plan Review Tool that replaces the Crosswalk (effective Oct 2012)
- Local Plan Review Guide that replaces the Planning Guidance (effective Oct 2012)
- Local Mitigation Planning Handbook (released May 2013)
- Web-based Plan Review Training (completed 2012)
Guiding Principles

1. Focus on Mitigation Strategy
2. Review for Intent, as well as Compliance Focus on whether mitigation plan meets the intent of the law and regulation.
3. Process is as Important as the Plan Itself
4. “This is the Community’s Plan”
5. Foster Relationships
6. Nation to Nation. Government to Government
7. FEMA as a Technical Advisor
Mitigation Plan Review Guide

- FEMA’s official source for defining the requirements of original and updated Local or Tribal Mitigation Plans
- Represents FEMA’s interpretation of all statutory or regulatory requirements
- Includes references to specific language in 44 CFR § 201.6/201.7 and descriptions of the relevant requirement to meet the Mitigation Planning regulation
- Must be referenced when completing the Local or Tribal Mitigation Plan Review Tool
Mitigation Plan Review Guide

Sections

- Introduction (purpose, roles and responsibilities)
- Plan Review Guiding Principles
- Completing the Plan Review Tool
- Regulation Checklist
- Plan Review Procedure (plan review, submittal, approval and adoption)
New Mitigation Plan Review Tool

- Used by State and FEMA reviewers to ensure that plan complies with 44 CFR Part 201.6/201.7
- Simplifies review process for States/FEMA Regions
- Provides user-friendly feedback to community
- Highlights positive features of the plan
- Offers opportunities for improvement beyond minimum requirements
- Enables more holistic review of plan and focuses on approving plans if they meet all essential elements
Local/Tribal Mitigation Plan Review Tool - Components

- Cover Page
- Regulation Checklist
- Plan Assessment
- Multi-jurisdiction Summary Sheet
Mitigation Plan Review Tool – Regulation Checklist

- Must be completed by FEMA
- Identifies location of plan content by sub-element
- Determines whether each element is “met” or “not met”
- Provides a clear explanation of revisions that are required for plan approval for each sub-element that is “not met” using appropriate numbers (A1, B3,)

### 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.

<table>
<thead>
<tr>
<th>ELEMENT A. PLANNING PROCESS</th>
<th>Location in Plan (section and/or)</th>
<th>Met</th>
<th>Not Met</th>
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<tbody>
<tr>
<td>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))</td>
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<td>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))</td>
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<td>A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))</td>
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<td>A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))</td>
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<td>A5. Is there discussion of how the community(ies) will continue public participation in the plan maintenance process? (Requirement §201.6(c)(4)(iii))</td>
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<td>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))</td>
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Mitigation Plan Review Tool – Plan Assessment

- MUST be completed by the FEMA Mitigation Planner
- Offers more thoughtful, focused feedback on the quality and utility of the Plan in a narrative format

Plan Strengths and Opportunities for Improvement
- Organized according to plan elements
- Only includes Recommended Revisions
- Suggested topics (italics) must be deleted

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.
Plan Assessment Summary

- Focuses on positive aspects of the plan
- Notes where the community is doing a really good job or where there may be areas of improvement
- Is a short narrative
- Does not address CFR requirements
- Does not replace other forms of communication
Mitigation Plan Review Tool – Resources for Implementing Your Approved Plan

- Provides a place for the FEMA Mitigation Planner to offer information, data sources and general suggestions on the implementation of the plan and specific mitigation actions.
- Provides a place for other possible sources of assistance including, but not limited to, existing publications, grant funding or training opportunities.
- Provides a place for States to add state and local resources, if available.
Resources for Implementing Your Approved Plan

Ideas may be offered on moving the mitigation plan forward and continuing the relationship with key mitigation stakeholders by identifying the following.

- What FEMA assistance (funding) programs are available (e.g., HMA) to the jurisdiction to assist with implementing the mitigation actions?
- What other Federal programs (NFIP, CRS, RiskMAP, etc.) may provide assistance for mitigation activities?
- What publications, technical guidance or other resources are available to the jurisdiction relevant to the identified mitigation actions?
- Are there upcoming trainings/workshops (BCA, HMA grants, etc.) to assist the jurisdiction?
Multi-Jurisdiction Summary Sheet

- List and identify a point of contact for each participating jurisdiction
- Explain whether the required elements for each jurisdiction were “met” or “not met”
- Document if adoption resolutions were received

<table>
<thead>
<tr>
<th>Multi-Jurisdiction Summary Sheet (Optional)</th>
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<tr>
<td><strong>INSTRUCTIONS:</strong> 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).</td>
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<tr>
<th>Jurisdiction Name</th>
<th>Jurisdiction Type (city/borough/township/village, etc.)</th>
<th>Plan POC</th>
<th>Mailing Address</th>
<th>Email</th>
<th>Phone</th>
<th>A. Planning Process</th>
<th>B. Hazard Identification &amp; Risk Assessment</th>
<th>C. Mitigation Strategy</th>
<th>D. Plan Review, Evaluation &amp; Implementation</th>
<th>E. Plan Adoption</th>
<th>Requirements Met (Y/N)</th>
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<td>ELEMENT C. MITIGATION STRATEGY</td>
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<td>C1. Does the plan document each jurisdiction’s existing authorities, policies, programs and resources, including continued compliance with the NFIP, and its ability to expand on and improve these existing tools? (Requirement §201.6(c)(3)(ii))</td>
<td>Pages 65-67</td>
<td>X</td>
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<td>C2. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(ii))</td>
<td>Pages 68-71</td>
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<td>C3. 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)(iii))</td>
<td>Pages 69-70</td>
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<td>C4. Does the Plan address NFIP participation and continued compliance as appropriate, for each jurisdiction? (Requirement §201.6(c)(3)(iii))</td>
<td>Pages 79-80, 81-84 68, 71-79 67-68</td>
<td>X</td>
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<td>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))</td>
<td>Pages 87-88</td>
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<td>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))</td>
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**ELEMENT C: REQUIRED REVISIONS**

C3. The plan does not contain a comprehensive range of mitigation actions for each hazard identified within the plan. A comprehensive range of actions is defined as multiple actions of varying type for each identified hazard. Tornado, Wildfire, Flood, Winter Storm/Ice Storm, and Dam Failure only have one action for a warning system. Include at least one more varying type of action for these hazards.

C4. The plan does not discuss the City of Pittsburgh’s participation in the NFIP. Discuss how the city participates in the program, thorough ordinances, permitting, regulating development in the floodplain, etc. The plan also does not contain actions demonstrating their continued compliance to the NFIP. Include within the strategy or within a narrative actions that will maintain the City of Pittsburgh continued compliance to the NFIP.
Local Mitigation Plan Review Tool – Resources for Implementing Your Approved Plan

- **FEMA is currently conducting a Risk MAP project in City of X. 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 (e.g. land use and zoning).**

- **BCA courses are offered and more information can be obtained on BCA sessions by contacting the State Hazard Mitigation Officer at 123-234-3456. As a key component of HMA sub-application development, this course assists communities in seeking funding for implementing effective mitigation projects. This course will be led by the State EMA and FEMA staff.**

- **The FEMA Region has expressed some interest in providing 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?](http://www.fema.gov/library/viewRecord.do?)**
Sample – Plan Assessment

Plan strengths:

- The public involvement process 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.

Opportunities for improvement:

- Consider providing more detail on the planning process. For example, list every meeting conducted and agencies represented at these meetings and 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 information on outreach methods, etc., for additional CRS credit. Contact the State CRS coordinator at 234-234-2345 for information.
Mitigation Plan Review Products - Summary

- 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
- Plan Review Assessment communicates implementation of the plan as well as improvements to the plan
Tribal—Additional Requirements

Planning Process - opportunity for public comment during the drafting stage and prior to plan approval, including a description of how the Indian Tribal government defined “public”

Grant Management Components

- A system for monitoring implementation of mitigation measures and project closeouts
- A system for reviewing progress on achieving goals as well as activities and projects identified in the mitigation strategy?
- A discussion of Tribal funding capabilities for hazard mitigation projects, current and potential funding sources and capabilities
Tribal—Additional Requirements

**Assurances** - that Indian Tribal government will comply with all applicable Federal statutes and regulations in effect during periods of grant funding

**Optional** - **Required** if the tribe is going to apply for FMA funding with reduced cost share as a grantee.
## 1. REGULATION CHECKLIST

**Regulation (44 CFR 201.6 Local Mitigation Plans)**

<table>
<thead>
<tr>
<th>ELEMENT A. PLANNING PROCESS</th>
<th>Crosswalk Section Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>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))</td>
<td>2A, 3A, 3B, 4A, 4B</td>
</tr>
<tr>
<td>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))</td>
<td>4D</td>
</tr>
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<td>A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))</td>
<td>4C</td>
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<td>20A</td>
</tr>
<tr>
<td>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))</td>
<td>18A, 18B, 18C</td>
</tr>
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</table>

**ELEMENT A - NOTES/SIGNIFICANT CHANGES FROM THE CROSSWALK**

- Multi-jurisdictional plan requirements have changed significantly in order to increase collaboration, and hold the jurisdictions accountable for participating in, and writing sections of the plan.
- Plan Maintenance is introduced into the Planning Process element as Element A6 so all planning process related sections could be kept together.
New Tool – Crosswalk Comparison

Element B – Notes/significant Changes from the Local Crosswalk

- Risk assessment is simplified and lumped in clusters. Type, location, event, etc. Previous occurrence and probability are kept together.

- B1 must include a summary or history but does not require an exhaustive list of data.

- B-1 (extent) and B-3 (location) have been kept separate based on the CFR.

- For each participating jurisdiction, plan must describe the potential impacts of each of the identified hazards on the community in quantifiable terms.

- Plan must provide an overall summary of each jurisdiction’s vulnerability (structures, populations, or other community assets) that are susceptible to damage and loss from identified hazard events.

- Plan must describe types (residential, commercial, etc.) and estimate the numbers of rep loss properties located in identified flood hazard areas.
Local Mitigation Planning Handbook

Purpose

- To provide guidance to local governments on developing or updating hazard mitigation plans to meet the requirements of Title 44 § 201.6 for FEMA approval and eligibility to apply for FEMA HMA grant programs.

- To offer practical approaches and examples for how communities can engage in effective planning to reduce long-term risk from natural hazards and disasters.
Local/Tribal Mitigation Planning Handbook Elements

Introduction

Tasks

- Determine the Planning Area and Resources
- Build the Planning Team
- Create an Outreach Strategy
- Review Community Capabilities
- Conduct a Risk Assessment
- Develop a Mitigation Strategy
- Keep the Plan Current
- Review and Adopt the Plan
- Create a Safe and Resilient Community
- Develop a Repetitive Loss Strategy (optional)

 Appendices – Worksheets, Plan Review Tool, Additional Resources, and Glossary
Mitigation Planning Handbook Icons

- **Federal Planning Regulations** – reference specific section of regulation and associated element in Plan Review Guide and Tool that must be met prior to FEMA’s plan approval
- **Mitigation Plan Updates** - plan update recommendations and requirements are addressed within each task
- **Examples and Special Topics** - concepts using examples from actual plans
- **Definitions** - used throughout Handbook and the glossary to elaborate on specific terms
Trainings on New Products

- Local Plan Implementation Process Webinars (completed 2012)
- IS 318 Online (date tbd)
- HAZUS-MH – Risk Assessment (recently revamped)
- G 318 (currently being updated)
- E582 – Mitigation for Tribal Governments: Protecting Tribal Communities and Resources – EMI and field deployable
- Tribal Plan Implementation Process Webinars (date tbd)
Questions?

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