FEMA Region V Local Plan Review Help Sheet April 2005

This help sheet combines the March 2004 FEMA Local Mitigation Plan Crosswalk with the March 2004 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 "shall" are items that reviewers will be looking for in FEMA plan reviews for each of the requirements.

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.

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)

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).

	Location in the 3/04		SCO	ORE
	Guidance (section or		NOT	
Element	annex and page #)	Reviewer's Comments	MET	MET
A. Has the local governing body adopted the plan?	p.2	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)		
B. Is supporting documentation, such as a resolution, included?	p.2	The plan shall include documentation of the resolution adopting the plan.		
		Not Met. The plan has not been formally adopted by the local governing body.		
		Not Met. The plan has been formally adopted by the local governing body, but a copy of the signed plan adoption resolution is <u>not</u> included.		
		Met. The plan has been formally adopted by the local governing body and a copy of the signed plan adoption resolution is included.		

SUMMARY SCORE

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.

	Location in the 3/04		SCO	ORE
	Guidance (section or		NOT	
Element	annex and page #)	Reviewer's Comments	MET	MET
A. Does the plan indicate the specific jurisdictions represented in the plan?	p.3	Shall indicate the specific jurisdictions represented in the plan.		
B. For each jurisdiction, has the local governing body adopted the plan?	p.3	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 before submission to the State and FEMA. NOTE: Plans without adoption documentation may be "approved pending adoption" by the Region.		
C. Is supporting documentation, such as a resolution, included for each participating jurisdiction?	p.3	Not Met. The plan has not been formally adopted by any local governing body.		

Met. The plan has been formally adopted by at least one local governing body and a copy of each of the signed plan adoptio resolutions is included.			
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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.

	Location in the 3/04		SCO	ORE
	Guidance (section or		NOT	
Element	annex and page #)	Reviewer's Comments	MET	MET
A. Does the plan describe how each jurisdiction participated in the plan's development?	p. 4	Therefore, the plan must document how each jurisdiction requesting FEMA recognition of the plan participated in the planning process. Not Met. The plan does not describe how each jurisdiction requesting FEMA recognition actively participated in the planning process.		
		Met. The plan describes how each jurisdiction requesting FEMA recognition actively participated in the planning process.		

SUMMARY SCORE

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

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.

				SCO	ORE
		Location in the 3/04			
		Guidance (section or		Ν	S
Ele	ment	annex and page #)	Reviewer's Comments		
Α.	Does the plan provide a narrative description of the	p. 6 (Example on	Shall document how the plan was prepared (e.g., the time		
	process followed to prepare the plan?	р. 6-9)	period to complete the plan, the type & outcome of meetings).		
В.	Does the plan indicate who was involved in the	p. 6 (Example on	Shall document who was involved in the planning process		

	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. 6-9)	(e.g., the composition of the planning team). <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.	
C.	Does the 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. 6 (Example on p. 6-9)	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, Web pages, storefronts, toll-free telephone lines, etc.)	
D.	Was there an opportunity for neighboring communities, agencies, businesses, academia, nonprofits, and other interested parties to be involved in the planning process?	p. 6 (Example on p. 6-9)	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. 6 (Example on p. 6-9)	Shall describe the review of any existing plans, studies, reports, and technical information and how these are incorporated into the plan.	

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.

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.

	Location in the 3/04		SCO	DRE
	Guidance (section or		N	s
Element	annex and page #)	Reviewer's Comments	IN	5
A. Does the plan include a description of the types of all natural hazards that affect the jurisdiction?	p. 10 (Example on p. 10-12)	Shall identify and describe the hazards likely to affect the area. It is critical that the plan identify all the natural hazards that can		
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.		affect the jurisdiction, because the hazard identification is the foundation for the plan's risk assessment, which in turn is the factual basis for the mitigation strategy. If the hazard identification omits (without explanation) any hazards		
Consult with the State Hazard Mitigation Officer to identify applicable hazards that may occur in the		commonly recognized as threats to the jurisdiction, this part of the plan cannot receive a "Satisfactory" score.		
planning area.		<i>Should</i> describe the sources used to identify hazards, and provide an explanation for eliminating any hazards from		

 Reviewing the State hazard mitigation plan, reports, plans, flood ordinances, and land use regulations, among others; Talking to experts from Federal, State, and local agencies and universities; Searching the Internet and newspapers; and 	consideration. The process for identifying hazards could involve the following:
and universities;Searching the Internet and newspapers; and	
 Interviewing long-time residents 	Searching the Internet and newspapers; and
	Interviewing long-time residents.

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.

	Location in the 3/04		SCC	RE
Element	Guidance (section or annex and page #)	Reviewer's Comments	Ν	S
A. Does the risk assessment identify the location (i.e., geographic area affected) of each natural hazard addressed in the plan?	p. 13 (Example on p. 13-16)	Shall include the location or geographical areas in the community that would be affected. Should 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) should 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 storms, wildfires, tsunamis, and landslides).		
B. Does the risk assessment identify the extent (i.e., magnitude or severity) of each hazard addressed in the plan?	p. 13 (Example on p. 13-16)	 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. Should indicate the recorded intensities of previous events, such as in tornado prone areas. Should describe the conditions, such as topography, soil characteristics, meteorological conditions, etc., in the area that may exacerbate or mitigate the potential effects of hazards. Should be detailed enough to allow identification of the areas of the jurisdiction that are most severely affected by each hazard. 		

	I		
		<i>Should</i> describe the analysis or sources used to determine the probability, likelihood, or frequency of occurrence.	
in the plan?			
(i.e., chance of occurrence) for each hazard addressed	on p. 13-16)	hazard event would occur in an area.	
D. Does the plan include the probability of future events	p. 13 (Example	Shall include probability, likelihood, or frequency that the	
		 Sources of information used or consulted for assembling a history of past occurrences. 	
		Date of occurrence.	
		Duration of event.	
		• Level of severity (i.e., flood depth or extent, wind speeds, earthquake intensity, etc.).	
		• Information on the damages that occurred (e.g., costs of recovery, property damage, and lives lost) to the extent practicable.	
		Should include:	
C. Does the plan provide information on previous occurrences of each hazard addressed in the plan?	p. 13 (Example on p. 13-16)	Shall include discussion of past occurrences of hazard events in or near the community.	
		Should describe the analysis or sources used to determine the severity or magnitude of future hazard events.	

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.

	Location in the 3/04		SCO	ORE
Element	Guidance (section or annex and page #)	Reviewer's Comments	Ν	S
A. Does the plan include an overall summary description of the jurisdiction's vulnerability to each hazard?	p. 17 (Example on p. 17-18)	Shall include an overall summary of each hazard.		
		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.		
B. Does the plan address the impact of each hazard on the jurisdiction?	p. 17 (Example on 17-18)	Shall also include a general description of the extent of the hazard's impact to vulnerable structures.		
		Should 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.		

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

	Location in the 3/04		SCO	ORE
Element	Guidance (section or annex and page #)	Reviewer's Comments	Ν	S
A. Does the plan describe vulnerability in terms of the types and numbers of existing buildings, infrastructure, and critical facilities located in the identified hazard areas?	p. 19 (Example on p. 19-21)	 Should 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. Should document the process and sources used to identify existing and future structures. Should 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. 		
B. Does the plan describe vulnerability in terms of the types and numbers of future buildings, infrastructure, and critical facilities located in the identified hazard areas?	p. 19 (Example on p. 19-21)	Should be based on an inventory of proposed 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. Should determine how far into the future they wish to go in considering proposed buildings, infrastructure, and critical facilities, including planned and approved development.		

SUMMARY SCORE

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)(i)(A) of this section and a description of the methodology used to prepare the estimate

	Location in the 3/04		SCO	DRE
Element	Guidance (section or annex and page #)	Reviewer's Comments	Ν	S
A. Does the plan estimate potential dollar losses to vulnerable structures?	p.22 (Example on p. 22-24)	Should include an estimate of losses for the identified vulnerable structures. 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.		
 B. Does the plan describe the methodology used to prepare the estimate? 	p.22 (Example on p. 22-24)	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. Should provide the methodology used to determine losses.		

SUMMARY SCORE

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.

Guidance (section or annex and page #) Reviewer's Comments A. Does the plan describe land uses and development trends? p. 25 (Example on p.25-26) Should 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	Ν	c
trends? p.25-26) development occurring within the community. This can include existing and proposed land uses as well as development		3
densities in the identified hazard areas and any anticipated future changes.		

SUMMARY SCORE

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.

	Location in the 3/04		SCO)RE
Element	Guidance (section or annex and page #)	Reviewer's Comments	Ν	S
A. Does the plan include a risk assessment for each participating jurisdiction as needed to reflect unique or varied risks?	p.27 (Example on p.27-28)	 Shall present information for the general planning area as a whole Shall include information for particular jurisdictions for hazard risks and associated losses if they occur in only part of the planning area. Should indicate unique construction characteristics among jurisdictions so that appropriate mitigation actions are considered. 		

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.

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.

	Location in the		SCC	DRE
Element	Plan (section or annex and page #)	Reviewer's Comments	Ν	S
A Does the plan include a description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards? (GOALS are long-term; represent what the community wants to achieve, such as "eliminate flood damage"; and are based on the risk assessment findings.)	p. 30 (Example on p. 30-31)	 Shall list the goals intended to reduce or avoid the effects of the identified hazards addressed in the risk assessment Should include how goals were developed. Should also be compatible with the goals of the community as expressed in other community plan documents 		
		Should be based on the findings of the local and State risk assessments.		
		Should represent a long-term vision for hazard reduction or enhancement of mitigation capabilities.		

SUMMARY SCORE

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.

1 0 0 00	Location in the 3/04			DRE
Element	Guidance (section or annex and page #)	Reviewer's Comments	Ν	S
A. Does the plan identify and analyze a comprehensive range of specific mitigation actions and projects for each hazard?	p.32 (Example on p.32-35)	Shall list potential loss reduction actions it has identified in its planning process and evaluate various actions that achieve the community's goals and objectives to reduce or avoid the effects of the identified hazards. Should 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.		
B Do the identified actions and projects address reducing the effects of hazards on new buildings and infrastructure?	p.32 (Example on p.32-35)	Shall address existing buildings and infrastructure.		
C. Do the identified actions and projects address reducing the effects of hazards on existing buildings and infrastructure?	p.32 (Example on p.32-35)	Shall address new buildings and infrastructure.		
		SUMMARY SCORE		

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.

	Location in the 3/04		SCO	ORE
Element	Guidance (section or annex and page #)	Reviewer's Comments	Ν	S
A. Does the mitigation strategy include how the actions are prioritized ? (For example, is there a discussion of the process and criteria used?)	p. 36 (Example on p. 37-40)	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 mitigation strategy address how the actions will be implemented and administered ? (For example, does it identify the responsible department, existing and potential resources, and timeframe?)	p. 36 (Example on p. 37-40)	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.		

		Should also include a cost estimate or budget for each action, when available.	
C. Does the prioritization process include an emphasis on the use of a cost-benefit review (see page 3-36 of <i>Multi-Hazard Mitigation Planning Guidance</i>) to maximize benefits?	p. 36 (Example on p. 37-40)	 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" 	
		 Ways to address this requirement are: Describing how benefits will be evaluated prior to the implementation of projects listed in the plan, to ensure that only cost-beneficial projects are completed. 	
		Assessing the economic impact of one action compared to another.	
		• Showing how one type of action costs more than another to achieve the same benefit.	
		Showing that funding is available for one type of action but not another.	
		SUMMARY SCORE	

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.

	Location in the 3/04		SCO	DRE
Element	Guidance (section or annex and page #)	Reviewer's Comments	Ν	S
A Does the plan include at least one identifiable action item for each jurisdiction requesting FEMA approval of the plan?	p.41 (Example on p.41-42).	 Shall contain a section that links the proposed mitigation actions to the applicable jurisdictions 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 		

PLAN MAINTENANCE PROCESS

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.

	Location in the 3/04	[SCC	DRE
Element	Guidance (section or annex and page #)	Reviewer's Comments	Ν	S
A. Does the plan describe the method and schedule for monitoring the plan? (For example, does it identify the party responsible for monitoring and include a schedule for reports, site visits, phone calls, and meetings?)	p. 44 (Example on p. 44-46)	 Shall describe the how, when, and by whom the plan will be monitored. 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. 		
B. Does the plan describe the method and schedule for evaluating the plan? (For example, does it identify the party responsible for evaluating the plan and include the criteria used to evaluate the plan?)	p. 44 (Example on p. 44-46)	 Shall also include a description of how, when, and by whom the plan will be evaluated. Should include the criteria used to evaluate the plan. 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. 		
C. Does the plan describe the method and schedule for updating the plan within the five-year cycle?	p. 44 (Example on p. 44-46)	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.		
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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.

	Location in the 3/04		SCC	DRE
Element	Guidance (section or annex and page #)	Reviewer's Comments	Ν	S
A. Does the plan identify other local planning mechanisms available for incorporating the requirements of the mitigation plan?	p. 47 (Example on p. 47-48).	Shall identify other local planning mechanisms available for incorporating the requirements of the mitigation plan.		
B. Does the plan include a process by which the local government will incorporate the requirements in other plans, when appropriate?	p. 47 (Example on p. 47-48).	Shall indicate how mitigation recommendations will be incorporated into comprehensive plans, capital improvement plans, zoning and building codes, site reviews, permitting, job descriptions, staff training, and other planning tools, where such tools are the appropriate vehicles for implementation.		

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.

	Location in the 3/04		SCORE	
Element	Guidance (section or annex and page #)	Reviewer's Comments	Ν	S
A. Does the 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?)		Shall describe what opportunities the broader public (i.e., stakeholders who are not part of the planning team) would have during the plan's periodic review to comment on the progress made to date and the proposed plan revisions. <i>Should</i> describe the mechanisms for keeping the public involved (e.g., holding strategic meetings, posting the proposed		
		changes to the plan on the Web, etc.)		

SUMMARY SCORE