Mitigation Planning Policy Update Summary of Feedback

October 13, 2020

FEMA

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1. Purpose of the Report

The mitigation planning policies, commonly known as the Plan Review Guides, are the official interpretation of the hazard mitigation planning requirements found in the Code of Federal Regulations (CFR). FEMA is reviewing and revising these policies in accordance with agency requirements. The policies will be updated to reflect legislative and regulatory changes as well as other FEMA programs, plans, strategies, and initiatives. The updates will clarify existing requirements and make practical changes to improve ease of use and promote consistency between the policies.

The goal of the policy updates is to provide consistent direction to state and FEMA officials responsible for reviewing state and local mitigation plans, and to provide state and local governments with information on how to meet the requirements of 44 CFR Part 201. Upon the completion of the policy update, there will be a one-year transition period before the updated policies become effective to allow time for plan developers to gain awareness and understanding of the new requirements.

It is important to distinguish the policies from other FEMA documents that provide tools and various approaches for developing mitigation plans. Policies are the official interpretation of the CFR which outline the required planning requirements. FEMA has also developed and made available several resources, such as the Local Mitigation Planning Handbook, the State Mitigation Planning Key Topics Bulletins, and Mitigation Ideas, that provide information to assist in mitigation plan development and meeting the policy requirements. These "how to" resources are typically updated following the release of updated policies.

The National Mitigation Planning Program conducted engagement around the policy updates in July and August 2020. This engagement was a broad call for ideas. The cornerstone of the engagement was three webinars held in mid-July 2020 to ask for ideas, comments, and suggestions from state and territorial governments, local communities, and other interested stakeholders. Stakeholders had the opportunity to provide comments during the webinars and for 30 days after via email.

This report provides a review of the stakeholder engagement process, an analysis of those who participated, and a summary of comments received.

2. Overview of Stakeholder Engagement

2.1. National Webinars

Three webinars were held on July 10, July 14, and July 16, 2020. Their purpose was to share information with states, local governments, and other partners related to the mitigation planning policies and to seek participants' feedback on the current state and local policies, given their experience with these policies over the past several years.

Each webinar provided a brief overview of the existing state and local mitigation planning policies and informed participants about the purpose for the policy update. After the initial presentation portion, FEMA staff and contract support read questions and comments aloud from the webinar chat function.

A recording of the webinar can be found on [FEMA's official YouTube channel](#).

2.1.1. Participation

In total, 552 unique participants attended the three webinars, with some participants attending on multiple days.

1. **July 10:** 394 participants

2. **July 14:** 327 participants

3. **July 16:** 195 participants

The majority of participants were from the continental United States, but there were also attendees from Alaska, Hawai'i, and the territories of the Commonwealth of Puerto Rico and the U.S. Virgin Islands. There were two international participants, a government official from Ontario, Canada, and a consultant from Australia.

Figure 1. Participants by Location

Most participants (154) were from state agencies, primarily homeland security and emergency management agencies. Local agencies made up the next largest group (108), followed closely by federal representatives (100). Private entities engaged in mitigation planning with local and state governments also made up a large share of the attendees (93).

Table 1. Categorization of Participants

Participant Category	Number of Participants	Participant Category	Number of Participants
State	154	Non-Governmental Organization	34
Local	108	Academic	21
Federal	100	Tribal	3
Private	93	Public	1
Unknown	38	*Grand Total*	*552*

2.2. Email and Other Engagement

In addition to the webinars, FEMA Headquarters contacted each FEMA Region, individual State Hazard Mitigation Officers (SHMOs), and other interested organizations, individuals and agencies

interested in FEMA to inform them about the opportunity to comment. SHMOs were encouraged to forward this information on to local communities and other interested parties. The FEMA Headquarters communication provided an overview of the process, including how FEMA could be contacted with any questions, dates for the webinars, and where to send comments. The National Mitigation Planning Program also advertised the comment period in the FEMA Bulletin for multiple weeks. In addition, FEMA Regional planners were invited to discuss the policies with their partners, and FEMA Region 8 organized regional-based listening sessions in early August.

A fact sheet and email were sent out prior to the webinars with information on how to sign up for regular email updates about upcoming engagements. This information was also included on the FEMA's website, in a weekly external communications e-newsletter, and in other FEMA publications. Stakeholders were also provided a link they could use to contact FEMA with any questions.

3. Comment Collection and Summarization

3.1. Methods of Collection

The National Mitigation Planning Program captured comments through the chat feature of the national webinars, during webinar question and answer sessions, and from emails sent to the FEMA Mitigation Planning policy update inbox. All comments were catalogued in a spreadsheet for analysis. To avoid duplication, if a comment provided either in the chat feature or during the open question and answer portion of a listening session, and then was followed up with an email that covered the same idea, this was counted as a single comment. A total of 439 unique comments were received from stakeholders.

3.1.1. Live Feedback

During the webinars, the chat function was used to capture feedback from participants in real-time. In many instances, FEMA representatives were able to verbally address comments as they came in during the question and answer portion. The chat allowed participants to pose questions to FEMA staff, but it also fostered a robust conversation among the participants. Many comments that were present in the chat were live discussions taking place between participants, or participants actively responding to statements in the presentations. All comments were exported out of the chat and cataloged accordingly. Comments that were purely related to logistics or requests for resource links (i.e., questions about the availability of a recording or where to find the policies) were captured but not analyzed for this report. A total of 164 unique policy comments were received through the chat.

In addition, after the FEMA staff presented the basic information on the policies, they invited participants to provide live spoken feedback and receive answers to questions. Some questions were pulled from the chat feature's history, and other questions were asked during an audio call. In total, 70 audio comments were captured and catalogued.

3.1.2. Follow-up Emails

Recognizing that not everyone would be able to participate in a webinar, the National Mitigation Planning Program provided an email address to which participants could send comments for 30 days following the last webinar. Emails were collected through FEMA-MitPlan-Guide-Updates@fema.dhs.gov.

Some emails were extensive and included multiple pieces of information. In order to best capture the feedback in this summary, emails were split into their individual ideas. This means that the number of comments received via email (205) is greater than the total number of emails received (53).

3.2. Comment Overview

A total of 439 unique comments were received through the webinar chat feature, webinar audio, and emails from 131 unique individuals. The FEMA team assigned affiliations based on webinar registration information and/or email addresses. If an attendee's affiliation could not be determined from the sign-in information, the designation "unknown" was used. Nearly half of the comments came from state agencies.

Table 2. Comments by Affiliation

Commenter Affiliation	Total
State	197
Federal	52
Local	45
Private	44
Academic	41
NGO	26
Regional / Council of Governments	18
Unknown	9
Public	7
Grand Total	*439*

The breakdown of comments by scope indicates that the highest number of comments were associated with the local policy, followed by comments that applied to both the state and local policies. State policy comments were the next highest in terms of volume. There were also questions and concerns related to best practices, grants eligibility and management, and training and guidance. Finally, some comments were wholly outside the scope of the policy updates or had an undetermined scope.

Table 3. Scope of Comments

Scope of Comment	Total	Scope of Comment	Total
Local	153	Best Practices	23
State and Local	126	Outside Scope	18
State	86	Grants	7
Training and Guidance	24	Unknown	2

4. Findings

4.1. Comment Categories

An analysis of the comments found that there were three general categories:

1. **Process and Procedures:** Comments relating to the procedures of developing and updating hazard mitigation plans. This category also includes overall comments about usability, readability, and the review process.

2. **Element Specific:** Comments that connect to a particular element or sub-element of the plan review requirements.

3. **Indirect:** Comments that are related to mitigation planning but are not immediately within the scope of the current policy updates. These include comments and suggestions about training and approaches to plan development, Hazard Mitigation Assistance (HMA) grant information, and best practices.

These general categories were further divided into themes to assist in summarizing the feedback. Direct quotes are included throughout this section in bold italics.

4.2. Comment Themes

FEMA assigned each comment to one of 24 themes. Many included general comments that were either specific wording changes or that were overarching to the Guides on the whole. Looking at the element-specific comments, the Hazard Identification and Risk Assessment and Mitigation Strategy and Actions themes had the most comments. In Sections 4.3, 4.4, and 4.5, the comments are organized by category, with themes presented according to the volume of comments in decreasing order.

Table 4. Comments by Category and Theme

Theme	Category	Number of Comments
General Comment	Indirect	48
Mitigation Strategy and Actions	Element-Specific	46
Hazard Identification and Risk Assessment	Element-Specific	44
Best Practices	Indirect	30
Plan Integration and Incorporation	Element-Specific	27

Theme	Category	Number of Comments
Enhanced Guidance	Element-Specific	25
Training Needs	Indirect	25
Vulnerability	Element-Specific	23
Partnerships and Participation Requirements	Element-Specific	18
National Flood Insurance Program Alignment	Element-Specific	16
Review Consistency	Process and Procedures	15
Clarity and Reducing Duplication	Process and Procedures	15
Crosswalk and Plan Review Tool	Process and Procedures	14
Approval Period	Process and Procedures	12
Future Conditions	Element-Specific	12
HMA and Other Grants	Indirect	12
Limited Community Capability	Process and Procedures	11
Pandemic and HMPs	Indirect	9
Multi-jurisdictional Requirements	Process and Procedures	8
Capabilities	Element-Specific	8
High Hazard Potential Dams (HHPD) Grant Program Requirements	Element-Specific	8
Plan Maintenance and Adoption	Element-Specific	7
Align State/Local Guidance	Process and Procedures	6
Grand Total		**439**

4.3. Process and Procedure Comments

4.3.1. Review consistency

Local and State: Commenters highlighted discrepancies in how FEMA Regions interpret the plan review requirements, both for states and local plan reviews. This can cause confusion for local governments and is a challenge for consultants that work across large geographies. Comments

received highlighted differences in the interpretation of element C4 (see Section 4.4.1 for more details).

> *"All FEMA Regions should have the same interpretation and expectations from requirements. This could perhaps be achieved by having consistent technical assistance."*

> *"The plan requirements should clearly state all aspects that are required/accepted."*

> *"The guidance requires greater detail and specificity. Currently, the guidance is broad and therefore leaves room for broad interpretation. The same standards are not applied equitably across the country."*

Several participants suggested that less focus be placed on the semantics of a plan and the letter of the requirements, and more on the intent. There are some instances where plans were turned back due to minor wording issues rather than errors or issues that do not meet the CFR requirements.

> *"This isn't something for the Guide documents themselves, but I would encourage FEMA HQ to communicate to the regions that their comments should be focused on things that will actually reduce risk, rather than just editorial or concentrating on verbiage. For example, one plan noted that they didn't have any RL [repetitive loss] properties, but the region rejected it because they didn't also specify they had no SRL [severe repetitive loss] properties. Another plan comment was that they didn't use enough "action verbs" in their project descriptions. Those sorts of comments do nothing to make communities more resilient to hazards."*

Overall, these comments all point to a need to clearly articulate expectations and ensure consistent plan review results regardless of the federal reviewer.

4.3.2. Clarity and reducing duplication

Local and State: On the whole, commenters asked for the planning policies to be simplified, clearly laid out, and include sufficient detail so that plan developers understand what is expected. They recommended using bullets, lists, or other methods of clearly listing what would be required for each element and sub-element. Some commenters suggested that presenting the requirements more clearly in the respective Guide may help improve the efficiency and effectiveness of the plans and the planning process.

> *"Simplifying the requirements for the plan sections would provide for the flexibility to create more effective planning processes. Often, there is so much extra information in these plans that they end up being hundreds of pages long - which no one is going to read, especially those communities with little or no planning staff."*

Commenters in this theme offered several specific instances where they found terminology to be confusing within the planning policies. For instance, the term "extent" is very often confused for

geographic location, rather than potential magnitude. This coincides with the general hope that more common terms will be used.

> *"It's challenging when I have to explain to my communities things that are "FEMA terms" and not commonly understood language. Please use common language."*

Some commenters suggested that the updated Guides could potentially say more about the Program Administration by States (PAS) in the new policy, and one comment indicated that the State Guide could be presented in a way that makes it easier to read.

4.3.3. Crosswalk and Plan Review Tool

Local and State: Commenters shared a desire to see the Plan Review Tool be further divided into the sub-elements and requirements (A1-a, A1-b, A1-c, etc.) to more clearly articulate what is expected for each element.

> *"Re-organize the structure of the review tool to separate out each requirement. We had to create our own review tool that separated each required element out because the general elements are vague, which is not how the plans are reviewed."*

The commenters believe it would clarify the specific requirements for local jurisdictions.

4.3.4. Approval Period and Review Time Frames

Local and State: There were several comments regarding the approval period. Some suggested that the approval period should be longer than five years (e.g., 7- or 10-year approval periods) and that the approval period should be synced with local comprehensive plan updates. Some expressed concern regarding COVID-19 and the ability to complete updates on time.

It is important to note that the approval period is established in the CFR. Because there are no regulation changes associated with these policy updates, the review period will not be changed in this update.

4.3.5. Multi-jurisdictional Requirements

Local: Commenters expressed concern about how each community meets the planning requirements, especially for the hazard identification and risk assessment (HIRA). For example, smaller communities with limited capabilities (e.g., small staff or no staff) may not have the institutional knowledge to address vulnerabilities in mitigation projects. Related comments pointed out the challenges of knowing what information can be included in the "plan as a whole" versus the content and level of detail required for each jurisdiction's unique risks.

> *"Guidance does not currently exist for larger multi-jurisdictional plans to support effective planning without beleaguering the process, especially as it pertains to the hazard*

identification and risk assessment. Currently the expectation is that we are going into significant detail by jurisdiction by hazard even if the hazard profile is uniform across the plan coverage area. A long plan does not equal an effective plan."

"FEMA has tightened up interpretations on specific requirements that each jurisdiction must meet in local multi-jurisdictional plans. It would be good if the update would clarify exactly what is required for each jurisdiction and, where jurisdiction specific information is not available, what the plan should do in order to satisfy the requirement."

"In some multi-jurisdictional plans, there are different approaches to the risk in the planning areas as a whole and the risk broken out per jurisdiction, which creates redundancy. How do we encourage calling out original and unique risks for each jurisdiction?"

4.3.6. Align State and Local Guidance

State and Local: Regarding alignment of the State and Local Plan Review Guides, commenters asked for additional information explaining how they relate to one another and why both are necessary.

"Put some thought and visibility into the requirements that relate to distilling information from the local level into the state plan. It can be hard to summarize since there are so many local plans with so much content – and there is still the need to maintain a broad, state-level perspective."

The idea of aligning the two Guides to sync with one another was generally very well-received, especially in terms of formatting. It was generally agreed that the Local Guide is more easily understandable than the State Guide.

"Great idea on aligning the State and Local Guides, not only format, but information on how they relate to each other and why they are needed."

4.4. Element-Specific Comments

4.4.1. Mitigation Strategy and Actions

Local and State: There were several comments regarding various aspects of the mitigation strategy requirements. These include:

- Consideration of mitigation actions that are project-oriented under FEMA's Hazard Mitigation Assistancegrant programs and broader mitigation actions and how to better describe and coordinate these different types of actions.

- Definitions and consistent application of the requirements such as the local planning element that requires the plan to include a comprehensive range of mitigation actions being considered for each jurisdiction to reduce the effects of the hazards. (Element C4).

- Concerns about needing to include new actions, especially in small or low-capability communities with few changes in risk and limited development changes since the previous plan. Commenters asked for commonsense approaches to developing the mitigation strategy that would result in implementable risk reduction. One state recommended that high- and medium-priority hazards be required to have mitigation actions.

- What specifically is required with respect to mitigation actions in a plan update? For example, how can actions be carried forward even if they are incomplete rather than having to create new actions that may not be pursued.

Another comment stated that project-related actions in updates should describe the latest activity and not just indicate that they are "ongoing." A few commenters spoke about implementing mitigation actions; one requested additional guidance for action development such as cost estimation, benefit-cost considerations, and resources to implement actions. Another said the Guides should focus more on creating and implementing mitigation strategies, including using more of the planning budget (or planning-related activities funding) for tools and resources that could help with implementation.

> *"My biggest overall concern with mitigation planning is that most plans don't lead to projects and are extremely expensive to produce."*

> *"Would like to see ideas on effective ways to get local communities to 'buy-in' and commit to implementing strategies."*

Finally, eight of the comments relating to the mitigation strategy encouraged FEMA to better incorporate the use of nature-based solutions to reduce hazard risk. All eight were from non-governmental organizations and included using strategies to preserve open space, encourage green and natural infrastructure, and addressing community capability to use nature-based solutions. Adding references to nature-based solutions would also align with the National Mitigation Investment Strategy.

State: State policy comments related to the mitigation strategy were largely specific wording changes and considerations. For example, adding requirements to prioritize nature-based solutions; requiring that states identify non-FEMA and non-federal mitigation funding in the mitigation strategy; and requiring standard state mitigation plans to identify 406 mitigation projects.

4.4.2. Hazard Identification and Risk Assessment

Local and State: Roughly one-fourth of the comments within this theme were related to the expectations and use of data in the HIRA, including what is expected in hazard profiles when limited data or available or when jurisdictions have limited capacity to process data (e.g., GIS resources).

> *"It's essential that the plans continue to require the use of best available data. Some plans we see (in and out of state) are fairly deficient in this area. As far as assessing risks are concerned, the old adage of, "Garbage in, garbage out," holds true."*

> *"Finding data on some of the hazards is difficult – for example, fires. We struggle with not having a dataset and information available for this."*

Commenters also noted that the term "extent" is confusing and suggested clearer definitions and the use of examples may help to clarify FEMA's expectations.

It was also suggested that the Guide take social and economic vulnerability into account in the risk assessment.

Local: Commenters asked FEMA to consider allowing communities to address the top hazards in a jurisdiction rather than all hazards, noting that communities struggle with the expectations associated with low-probability but high-consequence events.

In general, commenters wanted risk assessments to be focused on what the hazard means for a community.

> *"For Element B, I think shorter and more direct is better."*

> *"Talking about the idea of each jurisdiction looking at the impact of hazards... we've seen too much emphasis on how hazards are formed and profiling hazards."*

State: Commenters asked whether the Guide could include information on incorporating nuisance flooding as a hazard in state plans; and including schools, wastewater treatment plants, and fuel terminals as critical facilities. One state also discussed the importance of developing a strong HIRA baseline at the state level that local governments could adapt and use for their own unique risks.

4.4.3. Vulnerability Assessments

Local and State: In discussing vulnerability assessments, many commenters encouraged FEMA to develop explicit instructions and/or requirements to include population vulnerability, especially social vulnerability. Nine of the 23 comments in this theme related to population and social vulnerability.

> *"How does mitigation planning at the state and local levels account for and implement actions to reduce social vulnerability?"*

> *"Vulnerability in plans tend to focus on life safety and protection of property, but where is social vulnerability in the plans? This should be a focus."*

> *"Plans should be required to assess and identify areas where socioeconomic factors increase vulnerability to impacts from natural hazards."*

In addition, commenters suggested additional guidance and expectations regarding how to define vulnerability could be helpful. They noted that vulnerability assessments are done differently across the country. Some are quantitative and asset-based, while others are qualitative.

Local: There were several comments related to the interpretation of vulnerability versus risk and exposure. One commenter mentioned that impact and vulnerability in the local policy are not the same and could be confused. It was also suggested that plans should take more of an asset-driven approach (as opposed to a hazard-driven approach).

4.4.4. Plan Integration and Incorporation

Local and State: Commenters noted that mitigation planning should align with other local and state plans like comprehensive plans, climate adaptation plans, resilience plans, wildfire protection plans, and plans for critical infrastructure. One non-governmental organization tied this need back to the National Mitigation Investment Strategy, which encourages "collaboration and commitment by the Federal Government, nonfederal partners, and individuals."

Local: Commenters expressed that additional clarification on the expectations for local governments to both incorporate existing plans, studies, and best available data into the mitigation plan and how to integrate the mitigation plan into other planning processes would be helpful. Commenters noted that there are connections between elements A4 (incorporation of existing material), C1 (mitigation capabilities), and C6 (plan integration). These could potentially be tied more closely together in the Local Mitigation Plan Review Guide.

> *"Clarify how communities can successfully meet A4 and C6 elements. Communities have a hard time understanding the different between them. We try to explain it as a cycle beginning with A4 before the plan is developed and ending with C6 once the plan is completed. But there is still confusion."*

One commenter noted that requirement C6-e, which requires plan updates to describe how the mitigation strategy was integrated over the previous plan's life cycle, is often missed.

State: All but two state policy-specific comments in this theme revolved around the integration of the Threat Hazard Identification and Risk Assessment (THIRA) process and mitigation plans. The webinar chat comments, which came exclusively from state partners, discussed whether the THIRA should be integrated into the state mitigation plan and, if so, how. States shared examples of what they did and noted that many saw the tie between integrating the THIRA and being accredited under the

Emergency Management Accreditation Program. Some stated that THIRA and HIRA requirements should be separated.

> *"Please keep the THIRA and HIRA requirements separate. FEMA's unmodified THIRA process is a capability analysis and NOT a process for identifying realistic hazards and vulnerabilities."*

Local and State: Comments pointed out the disconnect between the hazard mitigation plan and other planning mechanisms, both existing and under production. These are typically done in silos, isolated from one another.

4.4.5.   Enhanced Guidance

State: Commenters asked for additional clarity and more explicit expectations related to enhanced requirements in the state policy. They felt metrics and standards are not always clear and may vary from region to region. One state commented that FEMA should review the Hazard Mitigation Assistance grants management performance requirements with respect to the language in the CFR. The commenter stated that the requirements as currently written in the state policy do not allow for any errors and could potentially disrupt an enhanced plan status.

> *"Meeting the timeframe and requirements in the CFR is translated to "All" in the Guide. "All" does not leave any room for error, and in a state with hundreds of grants, it is incredibly idealistic to assume that zero will hit any stumbling blocks. While the goal should be "all", maintaining the capability to meet these timeframes should not have a 100% metric."*

Others expressed an interest in increased clarification around enhanced plan procedures, including how it fits in with the standard plan review process, whether a state can submit for enhanced mid-cycle (i.e., not at the five-year update), and the requirements and expectations around the annual state validation. One commenter mentioned that the appeals process regarding enhanced status should be included in the Guide.

4.4.6.   Partnerships and Participation Requirements

Local and State: Commenters encouraged FEMA to coordinate with other federal agency programs and ,accreditation entities like the Emergency Management Accreditation Program relative to mitigation planning.

Local: Commenters asked for additional clarification regarding the roles and responsibilities for planning participants, especially jurisdictions versus other stakeholders. Others noted that public participation has been historically weak and asked FEMA to explore ways to increase it. Commenters also had suggestions for specific language changes that would further enumerate who should participate in the planning process.

State: Commenters provided specific suggestions for new stakeholders to include in the list of potential partners in state policy element S2:Coordination with other agencies and stakeholders.

4.4.7.   National Flood Insurance Program and Community Rating System

Local and State: Of the 16 comments in this category, 12 relate to a specific issue: the availability of National Flood Insurance Program data, especially repetitive loss (RL) and severe repetitive loss (SRL) data. Commenters shared that it has become more difficult to get RL and SRL data under the program's system of record, Pivot.

> *"FEMA must make the PIVOT data shareable with locals or lose the requirement, and I don't think losing the requirement to analyze this data in the plan is the way to go."*

> *"Remove the requirement OR work with the NFIP team at FEMA and find a way for the NFIP at region level to provide this information [...] I would prefer and recommend this [second] option because it is an important topic for the mitigation plan."*

While including the number and type of RL and SRL properties is a requirement in the local policy (element B4), these data are also important for state mitigation planning.

Local: The remaining four comments relate specifically to the local policy. Commenters asked if the Community Rating System requirements would be integrated with mitigation plans. During the webinar, FEMA staff shared an existing resource that guides communities to align the Activity 510: Floodplain Management Plans with mitigation plans, Mitigation Planning and the Community Rating System Key Topics Bulletin.

4.4.8.   Future Conditions

Currently, the State and Tribal Plan Review Guides interpret the requirement to describe the probability of future hazard events to mean that probability must consider changing future conditions, including long-term changes in climate and weather patterns. The listening sessions held in July acknowledged the desire to interpret the requirement similarly in the local policy.

Local and State: Commenters recommending that FEMA strengthen the discussion of future conditions largely came from academia and non-governmental organizations.

> *"Address Future Conditions. We recommend that FEMA retain and strengthen the discussion of future conditions. The Hazard Identification and Risk Assessment section should include guidance on the types of changes in land use and the built environment that should be considered."*

One commenter cautioned that the policies need to be sensitive to the political realities of including climate change information when the plan needs to be adopted by elected officials. There were also overall general questions about whether more traditional climate adaptation actions would be

required in the plan. Finally, commenters provided specific wording changes to strengthen the connection between climate adaptation and mitigation planning in the policies.

4.4.9.   HHPD Grant Program Requirements

In Fiscal Years 2019 and 2020, FEMA was appropriated funds to implement the Rehabilitation of High Hazard Potential Dams (HHPD) Grant Program under the "Water Infrastructure Improvements for the Nation Act" or the "WIIN Act." The requirements for this grant program stipulate that the applicant must have in place a hazard mitigation plan that includes all dam risk.

Local and State: All comments under this theme requested that FEMA clearly describe and incorporate the mitigation planning requirements for HHPD funding in the state and local policies. One commenter suggested that HHPD requirements could be a part of the state enhanced planning requirements if it is not funded in future years.

4.4.10.   Capabilities

Local and State: Commenters recommended that state and local governments should be encouraged to include more explicit requirements related to building codes to better conform with the [FEMA Strategic Plan](#), [National Mitigation Investment Strategy](#), and the new pre-disaster mitigation program, [Building Resilient Infrastructure and Communities](#) (BRIC). These requirements could connect to demonstrating capability to reduce risk through building codes, and should also encourage the use of disaster-resistant codes in the mitigation strategy.

Another commenter suggested that FEMA should use the plan review process as an opportunity to identify and leverage opportunities to train partners as a part of building mitigation capabilities.

Local: Commenters suggested that the policies should explain what a capability is; list or describe the types of capabilities expected in a plan; and define what is meant by "expand and improve" in element C1.

> *"It would help if the four capability types are included so new planners will better know what needs to be included. the plan must also discuss the ability to expand on and improve these existing capabilities (policies and programs): Planning and Regulatory, Administrative and Technical, Fiscal Outreach and Education"*

4.4.11.   Plan Maintenance and Adoption

Local: Commenters suggested that FEMA further describe expectations for plan maintenance and adoption, including the process to update the plan and what must be in the adoption template. One commenter asked if there would be updates regarding the use of Regional Planning to assist in keeping the plan current.

4.5. Indirect Themes

As described previously, indirect comments are those that came up during the policy engagement process and, while relate to the policy updates, they are not specifically within the scope of the updates.

4.5.1. Hazard Mitigation Assistance and other Grants

In general, these comments were questions and observations about FEMA grant programs, including questions of whether FEMA funding could be used for planning, how much funding would be available for planning under the new BRIC program, and whether states could use Hazard Mitigation Assistance funds to provide direct technical assistance.

However, there were specific comments related to conforming to the mitigation planning and BRIC funding requirements.

> *"Will plans need to add lifelines impacted by each of their mitigation actions? If so, will the lifeline and action associated with a project have to be specific in a state or local plan in order for that project to be eligible?"*

> *"Please make sure this info is aligned with BRIC [technical assistance] for project development/scoping."*

> *"I firmly agree with the idea of the local plans and BRIC, especially making sure the language used is the same. If the BRIC application has certain general information required then towns should be able to go right to their plan and cut and paste... that would make these plans useful."*

One commenter suggested making it easier for local and public participation to count towards the local match for a planning grant.

4.5.2. Best Practices

There was a lively sharing of best practices and good examples of planning, especially during the national webinars. Commenters specifically asked FEMA to gather and publish examples of best practices to help other communities write their plans.

> *"It would be great to have a resource of some "best examples" of county HMPs [Hazard Mitigation Plans] across the nation. For example, how to address how hazards vary across geography. Especially for hazards that are very difficult to do that for (e.g. hail)."*

> *"A website or database of good practices should be developed and shared across FEMA regions to foster consistency in plan layout and support development of quality hazard*

mitigation plans. This could include examples of plans, hazard assessments, and well-done elements within plans."

During the call, the National Mitigation Planning Program staff shared that they were already creating a best practices portfolio and encouraged communities to share their successes.

There was also some discussion of using online or online-only plans. Participants asked for examples and shared their review and approval experience for online plans.

4.5.3.   Training and Guidance

As described in Section 1 of this report, training and guidance are usually updated after the new policies are in place and communities begin using them. A number of training and guidance comments were made during the policy engagement.

- Commenters noted a need to update the G-318 Local Planning Training and G-393 Mitigation for Emergency Managers. *Note: The G-393 course is a general mitigation course that is administered and updated by the FEMA Emergency Management Institute.*

- Commenters shared that they found the Mitigation Ideas publication useful and asked if it would be updated with new grant programs in mind and with real-world examples of projects.

- Commenters shared that the Local Planning Handbook's worksheets were helpful and could be expanded.

- A few commenters asked for plan templates to complete the planning process and the plan itself. One commenter asked for a "best plan" template.

Nearly all of these comments were captured during the webinars, and the National Mitigation Planning Program staff shared recent and upcoming training and guidance products. The training and guidance comments were also shared with the training and capability building lead at Headquarters for future consideration.

4.5.4.   Pandemic and Hazard Mitigation Plans

Given the ongoing COVID-19 pandemic, it was unsurprising that webinar participants and other participants asked about including pandemics in mitigation plans. During the webinars, participants used the chat box to share examples of mitigation plans that profiled pandemics. There was also general confusion over whether pandemics are considered a natural hazard or not. One state partner shared,

> *"Regarding pandemics and COVID, we have to remember to stay in the lane of what mitigation planning is. Unless it can be tied to a natural disaster, I don't recommend focusing on this as it may not be in the mitigation lane."*

These comments were considered indirect because FEMA does not prescribe which specific hazards must be included in a mitigation plan. Advice and guidance on including pandemic and infectious diseases in mitigation plans is largely a concern for future handbook and guidance documents and not the planning policies.

4.5.5. General Comments

The final group of comments is a mixture of very specific line edits (like updating outdated program and policy references), overarching comments not tied to procedures or a specific element, and comments that were outside the mitigation planning scope.

5. Conclusion and Next Steps

The stakeholder engagement process provides FEMA with many good ideas and considerations for the updates to the State and Local Mitigation Plan Review Guides. Moving forward, the general update process is to review and incorporate applicable comments from the public engagement process as well as comments from within the agency as the policies are revised. Dedicated teams will be working on preparing the updated state and local policies.

Once the State and Local Plan Review Guide drafts are complete and reviewed in accordance with the FEMA policy process, they will be released to the public. FEMA estimates release in early 2021. The policies will become effective one year from the release date, allowing ample time for FEMA to provide training and technical assistance to state, local, and territorial partners regarding the changes. States, territories, and local governments will also have time to make any adjustments needed to ensure that plans will continue to meet FEMA's requirements for approval.