

Unit 10: Exercise – Plan Review Comments and Plan Revisions



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Exercise – Plan Review Comments and Plan Revisions

This exercise involves:

reviewing a short excerpt of a plan;

trading reviews with another group who will craft a response to your review (in the form of a revised plan excerpt) **while your group responds to their comments; and**

returning the revised plan excerpts so both groups can see if their review comments yielded the desired results



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Plan Review Comments

Rules of Thumb:

1. When you score an element with an “N”, make sure you have clearly articulated the deficiency. Although you will provide a description of Required Revisions, this initial statement can unambiguously focus both you and the community on the specific issues to be addressed.



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Plan Review Comments

For example:

Under § 201.6 (c) (2) (ii) (A) Assessing Vulnerability: Identifying Structures, the Element says:

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?



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Plan Review Comments

In reviewing this element for the Darwin plan, one group wrote:

Reviewer: "Each individual hazard discussion provides an assessment of vulnerability to existing structures in the affected area."

...and then scored the Element with an "N".

If I am the local planner, how am I supposed to revise my plan to change the "N" to an "S"?



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Plan Review Comments

Rules of Thumb:

2. When you write either Required and Recommended Revisions, make sure it is clear what you want the community to do to either fix the actual deficiency (Required) or to attain a better planning product (Recommended).

To an extent, these statements can be mirror images of the statements regarding the deficiency. However, avoid asking questions that do not lead to an actual revision of the plan.



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Plan Review Comments

For example:

Under § 201.6 (c) (2) (ii) Assessing Vulnerability: Overview, the second Element says:

B. Does the plan address the impact of each hazard on the jurisdiction?



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Plan Review Comments

In reviewing this element for the Darwin plan, one group wrote (under Recommended Revisions):

Reviewer: "The discussion for tornado/extreme wind includes a discussion of the Community Center, housing, City Hall and the EOC. This is the only section where the discussion of impacts to a critical facility is included.

Is tornado the only disaster potentially taking the EOC out of service? And what are the impacts of eliminating essential services for an extended period of time?"



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Plan Review Comments

The response to these “recommended revisions” could be as follows:

Reviewer: “Is tornado the only disaster potentially taking the EOC out of service?”

Community: “No”.

Reviewer: “And what are the impacts of eliminating essential services for an extended period of time?”

Community: “Undesirable”.



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Plan Review Comments

One way these comments could have resulted in a better response is:

Reviewer: “Is tornado the only disaster potentially taking the EOC out of service?” If there are other disasters that could affect the EOC or other critical facilities, you should identify them in the plan.

Reviewer: “And what are the impacts of eliminating essential services for an extended period of time? You should state these impacts in terms of numbers of people potentially directly affected by property losses, the amount of business revenue (and related tax revenues) that could be lost on a daily basis in the affected areas, etc.”



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Plan Review Comments

Rules of Thumb:

3. When you want to mix Required and Recommended Revisions, segregate the statements you are making about the deficiencies and your “desires”. Some are directly related to the Rule and some are a result of what you would like them to do over and above the minimum.



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Plan Review Comments

It can work to show comments as follows (for an Element that gets an “N” score):

Statement of what is actually deficient in the plan relative to the Rule – only identify the issues that are keeping the plan from getting an “N”.

Required Revisions

Statement of what is needed to address the deficiencies.

Recommended Revisions

Statement of what else you would have liked to have seen.

Statement of what you are recommending the community consider as additional improvements to the plan.



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Plan Review Comments

This type of format for the Recommended Revisions can also work for Elements that get an “S” but did not “reach the heights”, i.e.,

Recommended Revisions

Statement of what else you would have liked to have seen (which can be preceded with a “pat on the back” for what they did to deserve the “S”).

Statement of what you are recommending the community consider as additional improvements to the plan.



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Plan Review Comments

Rules of Thumb:

4. When you write Recommended Revisions, regardless if it is for a “N” or an “S” element, it would be helpful to the community to get a sense of your expectation regarding when it would be appropriate to make this type of revision, i.e., do you think it is best to undertake this type of revision as part of the current planning cycle or during the next five year planning cycle.



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Plan Review Comments

Rule of Pinkie:

5. Whole Sentences.

It is not always clear what is meant by sentence fragments.

For example, does the following statement belong to an “N” or an “S” score:

Reviewer: “Community participation in the identification of hazards.”



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Unit 11: Course Summary



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Course Summary

Course Review

Feedback



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FEMA

A. Read the following plan excerpt and provide review comments for compliance with:

Requirement §201.6(c)(4)(ii), Element A:

Does the plan identify other local planning mechanisms available for incorporating the requirements of the mitigation plan?

Requirement §201.6(c)(4)(ii), Element B:

Does the plan include a process by which the local government will incorporate the requirements in other plans, when appropriate?

B. Provide review comments for **required** revisions as well as for **recommended** revisions.

C. Exchange review comments with Group B.

D. Read the review comments provided by Group B and revise the excerpt in direct response to the comments using track changes.

E. Exchange revised excerpts with Group B for final review and discussion.

Incorporation into Existing Planning Mechanisms

The County currently uses comprehensive land use planning, capital improvement planning, and building codes to guide development within the County. The Zoning Administrator and the Planning and Zoning Commission review and oversee zoning throughout the County.

After the County officially adopts the Hazard Mitigation Plan, these existing planning mechanisms will have hazard mitigation strategies incorporated into them. This will be done to increase mitigation opportunities in the County.

Incorporation into Existing Planning Mechanisms

Requirement §201.6(c)(4)(ii): *[The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan 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?				
SUMMARY SCORE				

Incorporation into Existing Planning Mechanisms

Requirement §201.6(c)(4)(ii): [The plan **shall** include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan identify other local planning mechanisms available for incorporating the requirements of the mitigation plan?		The plan does identify planning mechanisms available for incorporating mitigation strategies		✓
B. Does the plan include a process by which the local government will incorporate the requirements in other plans, when appropriate?		<p>Although the plan states that the County will incorporate mitigation strategies through the identified planning mechanisms, it does not describe the process to do so.</p> <p>Required Revisions:</p> <ul style="list-style-type: none"> Describe the process to incorporate the mitigation plan requirements into local planning mechanisms. <p>For more information on integrating hazard mitigation activities in other initiatives, see <i>Bringing the Plan to Life</i> (FEMA 386-4), Step 2.</p>	✓	
SUMMARY SCORE			✓	

Incorporation into Existing Planning Mechanisms

The County currently uses comprehensive land use planning, capital improvement planning, and building codes to guide development within the County. The Zoning Administrator and the Planning and Zoning Commission review and oversee zoning throughout the County.

After adoption of the Hazard Mitigation Program (HMP), the County will work with the local municipalities to identify mitigation strategies that can be implemented through their comprehensive plans and land use regulations. The County will conduct periodic reviews of their comprehensive plans and land use policies, and will provide technical assistance for the implementation of mitigation strategies, zoning activities, and building codes enforcement.

The County will also work with the Building and Safety Officers to ensure that construction standards, addressing high priority hazards, are adopted and implemented. Future capital improvement activities will be closely monitored to ensure that high hazard areas are properly mitigated in accordance to the HMP goals.

The evaluation of the HMP will also serve as a tool to determine the effectiveness of implementing mitigation actions through established planning mechanisms.

A. Read the following plan excerpt and provide review comments for compliance with:

Requirement §201.6(c)(4)(i), Element 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?)

Requirement §201.6(c)(4)(i), Element 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?)

B. Provide review comments for **required** revisions as well as for **recommended** revisions.

C. Exchange review comments with Group A.

D. Read the review comments provided by Group A and revise the excerpt in direct response to the comments using track changes.

E. Exchange revised excerpts with Group A for final review and discussion.

Monitoring and Evaluating the Plan

The Hazard Mitigation Committee with support and recommendations from the City's planning staff will establish a method for monitoring and evaluating the plan on a yearly basis. The City will evaluate the effectiveness of the programs and reflect changes in land development or programs that may affect mitigation priorities. The monitoring schedule includes a timeline and identifies local agencies that will monitor the actions.

The City will review the goals and actions to determine their relevance to changing conditions and to ensure that they are addressing current and expected hazard conditions. The plan's risk assessment section will be updated as new information is available and the goals and actions sections will be reviewed and updated to reflect completed actions.

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.*

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

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.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	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>The plan does not make a clear distinction between monitoring and evaluating the plan. Although related, monitoring the progress of the mitigation actions is not the same as evaluating the effectiveness of the plan. See <i>Bringing the Plan to Life</i> (FEMA 386-4), Step 2 and 3.</p> <p>There is no description of the method that will be followed to monitor the plan.</p> <p>Although there is a statement about the schedule for monitoring the actions, it is not clear what this schedule is.</p> <p>The plan states that the Hazard Mitigation Committee (HMC) with the City's planning staff will establish a method for monitoring the plan, and that local agencies will monitor actions. However, It is not clear what agencies will be responsible for monitoring the plan and what the HMC's role is.</p> <p>Required Revisions:</p> <ul style="list-style-type: none"> • Include a description of the method and a schedule to monitor the plan. Include in the description the parties/agencies responsible for ensuring that the monitoring process is accomplished, and how and when the plan will be monitored. <p>Recommended Revisions:</p> <ul style="list-style-type: none"> • Monitoring may include periodic reports by agencies involved in implementing actions; parameters to measure the progress of the actions; and projected date of 	✓	

		<p>completion.</p> <p>For guidance on monitoring the plan, see <i>Bringing the Plan to Life</i> (FEMA 386-4), Step 2.</p>		
<p>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>		<p>The plan briefly describes how the City will evaluate the plan, including the effectiveness of the programs changes in land development and mitigation programs, goal and actions to determine changing conditions and ensure that it addressed current and expected hazard conditions, etc. However, the plan does not provide a schedule for these activities.</p> <p>It is also not clear which agencies will be responsible for evaluating the plan.</p> <p>Required Revisions:</p> <ul style="list-style-type: none"> Describe the schedule to evaluate the plan. Include in the description the parties/agencies responsible for evaluating the plan, and how and when the plan will be evaluated. <p>For guidance on evaluating the plan, see <i>Bringing the Plan to Life</i> (FEMA 386-4), Step 3.</p>	<p>✓</p>	
<p>SUMMARY SCORE</p>			<p>✓</p>	

Monitoring and Evaluating the Plan

The Hazard Mitigation Committee (HMC) with support and recommendations from the City's planning staff ~~will establish~~ has developed a method for monitoring and evaluating the plan on a yearly basis. The monitoring schedule includes a timeline and identifies local agencies that will monitor the actions. The agencies responsible for implementing the mitigation actions will submit to the HMC a report on the progress of the actions on a quarterly basis. The report will include information on any special circumstances affecting the implementation of the action, such as, delays in the schedule, changes in the budget or scope of the action or changes in the hazard conditions or mitigation priorities. If necessary, the HMC will hold special meeting to address issues on site. Please refer to Appendix D titled *Monitoring Schedule* for reference on the agencies involved in this process.

On a yearly basis, ~~the~~ HMC will evaluate the effectiveness of the programs and reflect changes in land development or programs that may affect mitigation priorities. The information provided in the implementation progress reports will be used for the evaluation of the plan. Additional information will be collected on updates to planning regulations, documentation of new hazard events, and new development in the City. ~~The monitoring schedule includes a timeline and identifies local agencies that will monitor the actions.~~

The HMC will review the goals and actions to determine their relevance to changing conditions and to ensure that they are addressing current and expected hazard conditions. The plan's risk assessment section will be updated as new information is available and the goals and actions sections will be reviewed and updated to reflect completed actions.