

Mitigation Plan Review

National Emergency Training Center
Emergency Management Institute

Course E293



FEMA

Unit 1: Course Introduction



Intent of this training

Training conducted with FEMA Region staff is intended to:

Expand cadre of FEMA plan reviewers in anticipation of a substantial influx of local hazard mitigation plans;

Develop consistent interpretations of what can be required of communities regarding mitigation planning requirements per the Disaster Mitigation Act of 2000, aka DMA 2000; and

Identify ways to help communities improve planning capabilities and results for current and future mitigation planning efforts.



DMA 2000 “fun facts”

General Information

The Disaster Mitigation Act of 2000 (DMA 2000)

was signed by the President (Public Law 106-390) on October 30, 2000; and

*was intended **to facilitate cooperation between state and local authorities** across a broad spectrum of mitigation activities.*

Section 322 of the Act specifically:

*addresses **mitigation planning at the state and local levels**;
reinforces the importance of **pre-disaster** mitigation
planning; and*

*promotes **sustainability** as a strategy for disaster resistance.*



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DMA 2000 “fun facts”

General Information

*Commonly accepted emergency management terminology defines the phrase “**pre-disaster mitigation planning**” as ...*

*... “coordination of actions taken prior to a hazard event to reduce injuries, deaths, property damage, economic losses, and degradation of natural resources during and following **natural or manmade** hazard events”.*



DMA 2000 “fun facts”

General Information

*Recommendations resulting from **DMA 2000 compliant pre-disaster mitigation planning** are typically focused on:*

***physical projects** that reduce risk from **natural** hazards;
changes in land development regulations such as zoning
and building codes;
public education programs; and
addressing information and data deficiencies needed to
develop the plans.*



DMA 2000 “fun facts”

General Information

*To implement the DMA 2000 requirements, FEMA prepared an **Interim Final Rule (aka “the Rule”)**, published in the Federal Register on February 26, 2002 (at 44 CFR Parts 201 and 206), which established planning and funding criteria for states, tribes, and local governments.*

*The Interim Final Rule will eventually be amended as a Final Rule but that work **will not begin until after November 1, 2004.***



DMA 2000 “fun facts”

General Information

*Guidance created by FEMA HQ (e.g., **Multi-hazard Mitigation Planning Guidance**, the **State and Local Mitigation Planning How-to Guides**, etc.) provides meaningful background and clarification regarding the intent of and methodology to meet the requirements of the Rule.*

*But, the Rule is **THE Rule**.*



DMA 2000 “fun facts”

State Hazard Mitigation Planning

DMA 2000 established a pre-disaster mitigation program and required that a FEMA approved **standard state hazard mitigation plan** be in place by November 1, 2004 ...

... for a state to continue to be eligible to receive Hazard Mitigation Grant Program (HMGP) funding or Public Assistance (PA) under the recovery categories of the Stafford Act for disasters declared after November 1, 2004.



DMA 2000 “fun facts”

State Hazard Mitigation Planning

*DMA 2000 also identifies new requirements that allow HMGP funds to be used for planning activities and increases the amount of HMGP funds available to states that have developed and received FEMA approval of a comprehensive **enhanced state hazard mitigation plan** prior to the declaration of a disaster ...*

... from a maximum of 7½ percent up to a maximum of 20 percent of the total disaster declaration funding.



DMA 2000 “fun facts”

State Hazard Mitigation Planning

*State governments have certain responsibilities for implementing Section 322 via **activities at the state level** including:*

preparing and submitting a “standard plan” (preparing and submitting an “enhanced plan” is an option); and

reviewing and updating the state mitigation plan every three years.



DMA 2000 “fun facts”

State Hazard Mitigation Planning

*State governments also have responsibilities under Section 322, for supporting **activities at the local level** including:*

*providing technical assistance and training to local governments to assist them in applying for HMGP grants;
and*

supporting the development of local hazard mitigation plans.



DMA 2000 “fun facts”

Local Hazard Mitigation Planning

*DMA 2000 also required that individual **communities** have an approved **local hazard mitigation plan** in place ...*

... to be eligible for project grants under HMGP for disasters declared after November 1, 2004 and other grant programs such as the Pre-Disaster Mitigation Program (PDM).



DMA 2000 “fun facts”

Local Hazard Mitigation Planning

“Communities” as defined in DMA 2000 local mitigation plan requirements typically include counties, local municipalities and tribal governments (★) ...

... but can also include other local agencies and organizations (school systems, transportation authorities, public utilities, etc.)...

*... that can participate as a **subapplicant or subgrantee** to their respective states.*



DMA 2000 “fun facts”

Local Hazard Mitigation Planning

A local mitigation plan can apply to:

*a **single jurisdiction**; or*

***multiple jurisdictions** within a county, watershed, regional planning district (e.g., multi-county plans), etc. as long as each jurisdiction participated in the planning process. These plans are referred to as “multi-jurisdictional” pre-disaster mitigation plans.*



DMA 2000 “fun facts”

Local Hazard Mitigation Planning

Local governments have certain responsibilities for implementing Section 322, including:

preparing and submitting a local plan;

monitoring projects; and

reviewing and updating the mitigation plan every five years.



DMA 2000 “fun facts”

Tribal Hazard Mitigation Planning

Tribal governments have similar responsibilities for implementing Section 322, but have the option of submitting their tribal hazard mitigation plan as:

*a **state enhanced** hazard mitigation plan;*

*a **state standard** hazard mitigation plan*

*a **local** hazard mitigation plan; or*

all of the above.



Approach to the reviews

The plan review process is structured to provide:

- 1. Consistent interpretations of the relevant regulations i.e., the Rule (see full copy in Unit 1 of the Reference Manual) ...*

*... focusing primarily on a **quantitative** review of local hazard mitigation plans (see discussion of **Required Revisions**).*



Approach to the reviews

The plan review process is structured to provide:

- 2. **Meaningful guidance for planners and their respective communities** to not only meet the minimum regulatory requirements but realize maximum reduction of risks from natural hazards ...*

*... covering the **qualitative** aspects of plan reviews (see discussion of **Recommended Revisions**).*



Roles and Responsibilities

FEMA Headquarters (aka FEMA HQ) – Development and implementation of the DMA 2000 via the Rule via the FEMA Regional Offices

FEMA Region Offices – 10 autonomous offices covering all states and territories of the United States with specific responsibility for review and approval of state, tribal and local DMA 2000 hazard mitigation plans



Roles and Responsibilities

State Hazard Mitigation Offices – *Responsible for:*

development of a state-wide hazard mitigation plan;

support for tribal and local planning efforts;

preliminary reviews of tribal and local DMA 2000 hazard mitigation plans (in some FEMA Regions); and

review and approval of tribal and local DMA 2000 hazard mitigation plans once “managing state” status is attained

Individual Communities – *Development of single or multi-jurisdictional DMA 2000 hazard mitigation plans*



Roles and Responsibilities

URS – *On-call technical support to FEMA Regional Offices under the Hazard Mitigation Technical Assistance Program IDIQ contract for plan reviews and at times to states and individual communities for plan development (but under the ultimate supervision and direction of FEMA HQ)*



Plan Review Terminology

Crosswalk – The *Local Hazard Mitigation Plan Review Crosswalk* (as revised in March 2004) developed from the *Rule* and listing all the *Requirements / Elements* that *shall / should* be included in the plan (see the Crosswalk section of the Reference Manual)

Requirements – Wording quoted directly from the *Rule*, all of which must be successfully addressed for the *Plan* to be approved

Elements – Questions that break down the *Requirements* into component parts, all of which must be successfully addressed in the plan for the *Requirement* to be approved



Plan Review Terminology

Shall – Rule *Requirements* that must be addressed in the plan. Revisions that are indicated for *Elements* under these *Requirements* are considered as **Required Revisions**

Must = *Shall* (!)

Should – Rule *Requirements* that are encouraged to be addressed in the plan but not mandatory for approval. Revisions that are indicated for *Elements* under these *Requirements* are considered as **Recommended Revisions**



Local Plan Review Procedures

DMA 2000 Local Plan Review Background Information

Page 1 of the *Crosswalk* should be completed to the best of your ability with information provided in the plan or obtained from the community or State (including NFIP Participation information at the bottom of page 1).

Each Region may have their own way for adding names, titles and dates in the middle of page 1 and those preferences should be provided to the reviewer prior to beginning the review.



Local Plan Review Procedures

DMA 2000 Local Plan Review

Then, starting on Page 3 of the *Crosswalk*, skim through the whole plan (or one of the major divisions of the plan – i.e., Prerequisite(s) / Planning Process / Risk Assessment / Mitigation Strategies / Plan Maintenance Process) to quickly determine if the *Elements* listed in the *Crosswalk* are addressed or included in some way in the document.

As you go through this first pass at reading the plan, complete the second column ("Location in the Plan") of the *Crosswalk* for each *Element / Requirement* so you can easily find it again.



Local Plan Review Procedures

DMA 2000 Local Plan Review (continued)

Next, go back and determine if the passage(s) you located in your first pass through the plan fully addresses the questions posed under each *Element* while avoiding the “(e.g., ...) trap”.

If the answer is **yes**, score that *Element* with an ‘S’ for *Satisfactory* (or *Met* for the *Prerequisites*). To the extent practical, you can add comments regarding how you felt the plan met each individual *Element* receiving a ‘S’ score.

See the example at the bottom of instructions page for the *Crosswalk* in the Reference Manual.



Local Plan Review Procedures

DMA 2000 Local Plan Review (continued)

If the answer is **no**, score that *Element* with an 'N' for *Needs Improvement* (or *Not Met* for the *Prerequisites*). For each 'N' score, you must (shall!) provide comment(s). Comments need to provide clear guidance to communities regarding the specific improvements they need to make to their plans. This may be the only avenue available for you to communicate with the communities.

We recommend that you first provide a brief summary of what you feel the deficiency is and then provide a succinct description of what revisions are needed to bring this *Element* into compliance.

See the example at the bottom of the instructions page for the *Crosswalk* in the Reference Manual.



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Local Plan Review Procedures

DMA 2000 Local Plan Review (continued)

Resources that are available to plan reviewers that can be referred to when providing comments to communities include:

Multi-hazard Mitigation Planning Guidance (and/or the *Interim Criteria* – see “FEMA DMA Mitigation Planning Guidance Fact Sheet in the Reference Manual); and

State and Local Mitigation Planning How-to Guides.



Local Plan Review Procedures

DMA 2000 Local Plan Review (continued)

The Reference Manual includes a version of the *Crosswalk* with **sample language** for required and recommended revisions that can be used for this purpose (and is available in MSWord format).

The *Crosswalk* also includes a series of **matrices** (starting on page 11) that will help with reviewing plans that cover multiple hazards.



Local Plan Review Procedures

DMA 2000 Local Plan Review (continued)

For “*shall*” Elements, the revisions are listed as either **Required** or **Recommended Revisions**.

For “*should*” Elements, the revisions are only listed as **Recommended Revisions**.

In all cases, it is encouraged to provide recommendations and suggestions for how to improve the plan and/or subsequent updates beyond the minimum standards. However, this type of comment needs to be always clearly identified as *Recommended Revisions*.



Local Plan Review Procedures

DMA 2000 Local Plan Review (continued)

For each *Requirement*, determine if any of the *Elements* received an 'N' score. If so, the *Requirement* also receives an 'N' which is indicated in the Summary Score box at the end of each *Requirement* and also on Page 2 of the *Crosswalk*.

For the plan to be approved, all of the *Requirements* must be either *Met* or 'S' (with the exception of the three "should" *Requirements* indicated in gray shading under *Risk Assessment*).



Unit 2: Local Plan Review – Prerequisites and Planning Process



Prerequisite(s)

What is the purpose of this portion of the Plan Review Requirements?

Prerequisites are intended to confirm the commitment of the state, tribe or local community to follow through with the implementation of the plan.

This commitment is confirmed through the approval and adoption of the plan by local officials, and demonstrated by their submittal of formal resolutions of adoption.



Prerequisite(s) – Single Jurisdiction

IFR Requirement: § 201.6 (c) (5) Adoption by the Local Governing Body (1/3)

- A. *Has the **local governing body** adopted the plan?*
- B. *Is **supporting documentation**, such as a (“signed and sealed”) **resolution**, included?*

Key Words and Issues

“**local governing body**” – i.e., the one that could be an HMGP subgrantee, such as a town's Board of Selectmen or Town Council, a City Council, County Commissioners, a Tribal Council, etc.



Prerequisite(s) – Single Jurisdiction

IFR Requirement: § 201.6 (c) (5) Adoption by the Local Governing Body (cont'd)

Key Words and Issues (continued)

“adopted” versus **“approved”** – the local governing body must adopt the plan, the approval of the plan by the hazard mitigation team or another appointed body such as a planning commission is not enough

proof versus **assertions** – this is one of the few requirements where proof of compliance (i.e., a signed and sealed resolution) must be provided



Prerequisite(s) – Multi-Jurisdictional

IFR Requirement: § 201.6 (c) (5) Multi-Jurisdictional Plan Adoption (2/3)

- A. *Does the plan indicate the specific jurisdictions **represented** in the plan?*
- B. *For **each jurisdiction**, has the local governing body **adopted** the plan?*
- C. *Is **supporting documentation**, such as a (“signed and sealed”) resolution, included for each participating jurisdiction?*

Key Words and Issues

Multi-Jurisdictional hazard mitigation plans can be pursued in a number of different ways but at the end of the process, each of the individual jurisdictions must adopt the plan to preserve their HMGP eligibility.



Prerequisite(s) – Multi-Jurisdictional

IFR Requirement: § 201.6 (c) (5) Multi-Jurisdictional Plan Adoption (2/3 continued)

What if?

If a multi-jurisdictional plan identifies that a county and five constituent municipalities are “covered” by the plan but the submittal only includes resolutions of adoption from the county and four of the communities, is this requirement satisfied?

What if the fifth community never submits the resolution of adoption?



Prerequisite(s) – Multi-Jurisdictional

IFR Requirement: § 201.6 (a) (3) Multi-Jurisdictional Planning Participation (3 of 3)

A. Does the plan describe *how* each jurisdiction participated in the plan's development?

Key Words and Issues

“**how**” versus “**how well**” – the former is quantitative (revisions can be required) and the latter is qualitative (revisions can only be recommended)

also note the potential overlap of this requirement with § 201.6 (c) (1)
Documentation of Planning Process (slide 41)



Planning Process

What is the purpose of this portion of the Plan Review Requirements?

DMA 2000 is based on the premise that the hazard mitigation planning process needs to be as inclusive as possible.

The intent is to ensure that community values are expressed and that available information, expertise and resources are brought to bear on the community's issues to the extent possible.



Planning Process

IFR Requirement: § 201.6 (c) (1) Documentation of Planning Process (1 / 1)

- A. *Does the plan provide a narrative description of **the process followed** to prepare the plan?*
- B. *Does the plan indicate **who was involved** in the planning process?*

Key Words and Issues

“**the process**” may not always be defined or described in one tidy location in the plan

“**who**” can be satisfied by identifying organizations and/or agencies; names of individuals are not required



Planning Process

IFR Requirement: § 201.6 (c) (1) Documentation of Planning Process (1 / 1 cont'd)

- C. Does the plan indicate **how** the public was involved?*
- D. Was there an **opportunity** for neighboring communities, agencies, businesses, academia, nonprofits, **and** other interested parties to be involved in the planning process?*

Key Words and Issues

“opportunity” can be broadly interpreted and has both quantitative and qualitative aspects – relative success should be noted for review of Plan Maintenance Process

“and” versus **“or”**



Planning Process

IFR Requirement: § 201.6 (c) (1) Documentation of Planning Process (1 / 1 cont'd)

*E. Does the planning process describe the review and incorporation, **if appropriate**, of **existing** plans, studies, reports **and** technical information?*

Key Words and Issues

“**appropriate**” is in the eyes of the beholder

how will the reviewer know what, if anything is “**existing**”?



Small Group Working Session – Prerequisites and Planning Process

This session covers pages 3 and 4 of the Crosswalk.

The end product is a completed plan review of the Prerequisite and Planning Process for the City of Darwin, Iowa plan.



Small Group Results

Prerequisites and Planning Process

Element	Group 1	Group 2	Group 3	Group 4	Group 5	Group 6	Group 7	Group 8	Group 9	Group 10
§201.6 (c) (5) Adoption by the Local Governing Body										
A. Adoption										
B. Supporting documentation										
§201.6 (c) (1) Documentation of Planning Process										
A. Description of the process followed to prepare the plan										
B. Who was involved in the planning process										
C. How the public was involved										
D. How neighboring communities, agencies, businesses, academia, nonprofits, other interested parties had the opportunity to be involved in the process										
E. How existing plans, studies, reports and technical information were reviewed and incorporated in the plan (if appropriate)										



Unit 3: Local Plan Review – Risk Assessment



Risk Assessment

What is the purpose of this portion of the Plan Review Requirements?

DMA 2000 places a strong emphasis on a sound and comprehensive risk assessment as the foundation for a coherent hazard mitigation plan.

The intent is to ensure that the community is focusing available resources where they will be most effective in reducing exposure and risk.



Risk Assessment

IFR Requirement: § 201.6 (c) (2) (i) Identifying Hazards (1 of 7)

A. Does the plan include a *description* of the types of *all natural hazards* that affect the jurisdiction?

Key Words and Issues

“**descriptions**” vary in terms of what constitutes a hazard – e.g., are “hurricanes” a hazard?

= water (= coastal erosion; coastal flooding; and inland flooding) and

= wind (= wind borne debris; structural failures)

how will the reviewer know what constitutes “**all natural hazards**”?

“**manmade**” versus “**natural hazards**” = not required by DMA 2000

= official FEMA language), aka human-caused

= accidental and/or intentional technological events, terrorism, etc.



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Risk Assessment

IFR Requirement: § 201.6 (c) (2) (i) Identifying Hazards (1 of 7 continued)

What if?

What if a hazard is not mentioned at all but the rest of the plan is basically satisfactory?

What does that mean for subsequent reviews of the plan?



Risk Assessment

IFR Requirement: § 201.6 (c) (2) (i) Profiling Hazards (2 of 7)

Does the risk assessment identify the

A. **location** (e.g., hazard area)

B. **extent** (e.g., magnitude, severity)

C. **previous occurrences**

D. **probability of future events** (e.g., “high/medium/low” at a minimum of each hazard addressed in the plan)?

Key Words and Issues

how can the communities (and the reviewers) handle “**data deficiencies**” (in this and subsequent requirements)?



Risk Assessment

IFR Requirement: § 201.6 (c) (2) (i) Profiling Hazards (2 of 7 continued)

What if?

*What if the plan identifies that the best available data (b.a.d.!?)
was used but adequate information is not currently available
(aka data deficiencies)...*

*...and is specific about the data that is needed but not
present...*

*...but subsequent sections of the plan do not outline steps for
gathering data and completing the assessment over the next
planning cycle as a mitigation action?*

Should this requirement be scored as satisfactory?



Risk Assessment

IFR Requirement: § 201.6 (c) (2) (ii) Assessing Vulnerability: Overview (3/7)

- A. *Does the plan include an **overall summary description** of the jurisdiction's vulnerability to each hazard?*

What if?

*Would an “**overall summary description**” of vulnerable assets that only mentions generalized land use zones (residential, commercial, industrial) satisfy this Element?*

Would the same description with quantities (buildings, people, etc.) derived from “global” data such as the U.S. Census satisfy this Element?



Risk Assessment

IFR Requirement: § 201.6 (c) (2) (ii) Assessing Vulnerability: Overview (3/7 cont'd)

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

What if?

*would expressing the “**impact**” only in terms of the areas within the community that would be affected without the number of vulnerable assets by hazard and without addressing the value and/or percentage of damage anticipated for those assets, and/or the number of the population at risk (per Understanding Your Risk (FEMA 386-2) meet this element?*



Risk Assessment

IFR Requirement [**“should”**]:

§ 201.6 (c) (2) (ii) (A) Assessing Vulnerability: Identifying Assets (4 of 7)

- 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**?*
- 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**?*

Key Words and Issues

“future” buildings, etc. cannot be reliably predicted in the absence of a community master plan, comprehensive plan or some type of development projections



Risk Assessment

IFR Requirement [**“should”**]:

§ 201.6 (c) (2) (ii) (B) Assessing Vulnerability: Estimating Potential Loss (5 of 7)

- A. *Does the plan estimate **potential dollar losses** to vulnerable structures?*
- B. *Does the plan describe the **methodology** used to prepare the loss estimate?*

Key Words and Issues

it is not unusual to see **“potential dollar losses”** expressed in terms of total property value, i.e., a building in a flood zone that is assumed to be a 100% loss

descriptions of **“methodology”** may not be very “satisfying” but may still clear the bar - refinements may only be identifiable as recommended revisions



Risk Assessment

IFR Requirement [**“should”**]:

§ 201.6 (c) (2) (ii) (B) Assessing Vulnerability: Estimating Potential Loss (5/7 cont'd)

What if?

What if the results are inherently flawed due to low quality data inputs but the methodology is “scientifically based”?



Risk Assessment

IFR Requirement [**“should”**]:

§ 201.6 (c)(2)(ii)(C) Assessing Vulnerability: Analyzing Development Trends (6 of 7)

A. Does the plan describe *land uses and development trends*?

What if?

If the plan only includes a description of existing land use and an anecdotal assessment of growth trends (ala “we got houses and businesses and factories and we expect to get some more someday”), would this meet the requirement?



Risk Assessment

IFR Requirement:

§ 201.6 (c)(2)(iii) Multi-Jurisdictional Risk Assessment (7 of 7)

- A. *Does the plan include a risk assessment for **each participating jurisdiction** as needed to reflect **unique or varied risks**?*

Key Words and Issues

“**unique and varied risks**” is open to interpretation – it is important to focus on making sure that multi-jurisdictional plans do not paint the risks with too broad a brush – it is also important to note that as a reviewer, you will only know what they tell you in most cases - if there is a risk assessment in the plan, how will you know if it is or is not reflecting “**unique**” conditions?



Small Group Working Session – Risk Assessment

This session covers pages 5, 6 and the top half of page 7 of the Crosswalk.

The end product is a completed plan review of the Risk Assessment for the City of Darwin, Iowa plan.



Small Group Results

Risk Assessment

Element	Group 1	Group 2	Group 3	Group 4	Group 5	Group 6	Group 7	Group 8	Group 9	Group 10
§ 201.6 (c) (2) (i) Identifying Hazards										
A. Description of all natural hazards that affect										
§ 201.6 (c) (2) (i) Profiling Hazards										
A. Location of hazards										
B. Extent of hazards										
C. Information on previous occurrences										
D. Probability of future hazard events included										
§ 201.6 (c) (2) (iii) Assessing Vulnerability: Overview										
A. Overall summary of jurisdiction's vulnerability to each hazard										
B. Impact of each hazard on jurisdiction addressed										



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Small Group Results

Risk Assessment (continued)

Element	Group 1	Group 2	Group 3	Group 4	Group 5	Group 6	Group 7	Group 8	Group 9	Group 10
§ 201.6 (c) (2) (ii) (A) Assessing Vulnerability: Identifying Structures										
A. Description of types and number of existing buildings et al										
B. Description of types and number of future buildings et al										
§ 201.6 (c) (2) (ii) (B) Assessing Vulnerability: Estimating Potential Loss										
A. Estimate of potential dollar losses to vulnerable structures										
B. Description of methodology used to prepare loss estimate										
§ 201.6 (c) (2) (ii) (C) Assessing Vulnerability: Analyzing Development Trends										
A. Description of land uses and development trends										



Unit 4: Local Plan Review Working Session – Mitigation Strategy



Mitigation Strategy

What is the purpose of this portion of the Plan Review Requirements?

The main point of the plan is to come up with a coherent strategy to address the relevant risks for the community.



Mitigation Strategy

IFR Requirement: § 201.6 (c) (3) (i) Local Hazard Mitigation Goals (1 of 4)

- A. *Does the plan include a description of mitigation goals **to reduce or avoid long term vulnerability to the identified hazards?***

Key Words and Issues

the connection between the goals (and objectives) and the results of the risk assessment, i.e., “**the identified hazards**” is not always immediately apparent – including hazards that are identified, profiled and assessed but do not show up in the goals and goals that speak to issues that were not heretofore identified



Mitigation Strategy

IFR Requirement:

§ 201.6 (c) (3) (ii) Identification and Analysis of Mitigation Actions (2 of 4)

A. Does the plan identify and analyze a *comprehensive range* of mitigation actions and projects *for each hazard*?

Key Words and Issues

the original intent was for communities to analyze all mitigation options, i.e., “**a comprehensive range**”, for each identified problem hazard and/or area – most plans do not include anything more than a solitary action that is selected for a specific problem



Mitigation Strategy

IFR Requirement:

§ 201.6 (c) (3) (ii) Identification and Analysis of Mitigation Actions (2 of 4 continued)

- B. Do the identified action and projects address *reducing the effects of each hazard on new buildings and infrastructure?***

- C. Do the identified actions and projects address *reducing the effects of each hazard on existing buildings and infrastructure?***



Mitigation Strategy

IFR Requirement:

§ 201.6 (c) (3) (iii) Implementation of Mitigation Actions (3 of 4)

A. Does the mitigation strategy include *how* actions are *prioritized*?

Key Words and Issues

strategies for determining “**prioritized**” actions range from application of decision making tools such as STAPLEE to develop scores and ranks; to assigning a sense of urgency (high, medium, low); to simply listing actions in the chronological order the community expects to implement them



Mitigation Strategy

IFR Requirement:

§ 201.6 (c) (3) (iii) Implementation of Mitigation Actions (3 of 4)

- B. Does the mitigation strategy address *how* the actions *will be implemented and administered*?**
- C. Does the prioritization process include an *emphasis* on the use of *cost - benefit review* to maximize benefits?**

Key Words and Issues

“**implemented and administered**” imply that responsible parties “should” be identified but this cannot necessarily be required based on the Rule language

“**cost-benefit review**” can be interpreted as any process that takes into account relative or general cost and benefit relationships and does not require the application of tools like the benefit-cost module



Mitigation Strategy

IFR Requirement:

§ 201.6 (c) (3) (iv) Multi-Jurisdictional Mitigation Actions (4 of 4)

*A. Does the plan include **at least one identifiable action item** for each jurisdiction requesting FEMA approval of the plan?*

Key Words and Issues

mitigation actions that affect an entire planning area can be applied to the requirement of “**at least one identifiable action item**”

(this leads to a similar “what if” scenario as IFR Requirement: § 201.6 (c) (5) Multi-Jurisdictional Plan Adoption (slide 37))



Small Group Working Session – Mitigation Strategy

This session covers the bottom of page 7 through the top of page 9 of the Crosswalk.

The end product is a completed plan review of the Mitigation Strategy for the City of Darwin, Iowa plan.



Small Group Results

Mitigation Strategy

Element	Group 1	Group 2	Group 3	Group 4	Group 5	Group 6	Group 7	Group 8	Group 9	Group 10
§ 201.6 (c) (3) (i) Local Hazard Mitigation Goals										
A. Description of mitigation goals										
§ 201.6 (c) (3) (ii) Identification and Analysis of Mitigation Actions										
A. Comprehensive list of mitigation actions identified and analyzed										
B. Identified actions address new buildings										
C. Identified actions address existing buildings										
§ 201.6 (c) (3) (iii) Implementation of Mitigation Actions										
A. Description of how actions were prioritized (including the process and criteria used)										
B. Description of how cost and benefits were considered during the prioritization process										
C. Description of how actions will be implemented and administered										



Unit 5: Local Plan Review Working Session – Plan Maintenance Process



Plan Maintenance Process

What is the purpose of this portion of the Plan Review Requirements?

The DMA places high priority on the continuation of the planning process after the initial submittal.

In addition to the periodic need for the community to seek and receive re-approval from FEMA, the intent is to create a better institutional awareness and involvement in hazard mitigation as part of “regular” day-to-day activities.



Plan Maintenance Process

IFR Requirement:

§ 201.6 (c) (4) (i) Monitoring, Evaluating, and Updating the Plan (1 of 3)

*Does the plan describe the method, schedule, **and responsible agency** for*

*A. **monitoring** /*

*B. **evaluating** /*

*C. **updating***

the plan?

“**responsible agency**” is “implied” but not “specified”

“**monitoring**” versus “**evaluating**” definitions should be consistent with the Planning Guidance



Plan Maintenance Process

IFR Requirement:

§ 201.6 (c) (4) (ii) Implementation Through Existing Programs (2 of 3)

- 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?***

how will the reviewer know if the community is accurately depicting the “**other local planning mechanisms**” for incorporating the mitigation plan recommendations if none or only a few are identified in the plan



Plan Maintenance Process

IFR Requirement: § 201.6 (c) (4) (iii) Continued Public Involvement (3 of 3)

A. *Does the plan explain how **continued public participation** will be obtained?*

if earlier documentation suggests that public participation efforts were not successful during the plan, is that acknowledged in proposed “**continued public participation**” measures will work?



Small Group Working Session – Plan Maintenance Process

This session covers the bottom of page 9 through page 10 of the Crosswalk.

The end product is a completed plan review of the Plan Maintenance Process for the City of Darwin, Iowa plan.



Small Group Results

Plan Maintenance Process

Element	Group 1	Group 2	Group 3	Group 4	Group 5	Group 6	Group 7	Group 8	Group 9	Group 10
§ 201.6 (c) (4) (i) Monitoring, Evaluating, and Updating the Plan										
A. Method and schedule for monitoring the plan										
B. Method and schedule for evaluating the plan										
C. Method and schedule for updating the plan within a 5 year cycle										
§ 201.6 (c) (4) (ii) Incorporation into Existing Planning Mechanisms										
A. Other planning mechanisms for incorporating the requirements of the mitigation plan identified										
§ 201.6 (c) (4) (iii) Continued Public Involvement										
A. Continued public involvement explained										



Unit 6: Multi-Jurisdictional Plan Reviews



Multi-Jurisdictional Plan Reviews

Key Words and Issues

“**multi-jurisdictional**” plans take many forms – from true regional plans with global priorities to collections of what are essentially all local level plans

“**participation**” can be met through “adoption” only if all opportunities are available and the adopting communit(ies) are not coerced

Available Resources

Multi-Hazard Mitigation Planning Guidance



Unit 7: State and Tribal Plan Reviews



State and Tribal Plan Reviews

Key Words and Issues

Timing is “off for integration of local and state planning efforts (for this round

“**enhanced**” plans do **not** mean bigger and better “**standard**” plans

“**enhanced state program certification process**”

tribal governments can submit as local, state or both

Available Resources

Multi-Hazard Mitigation Planning Guidance



Unit 8: Manmade Hazard Mitigation Planning



Manmade Hazard Mitigation Planning

Key Words and Issues

“**manmade**” hazards are not included (for now) as primary hazards but often need to be accounted for as a secondary effect of natural hazard events (e.g., the nuclear reactor on the earthquake fault line or the refinery in the floodplain)

Available Resources

How-to #7

FEMA Antiterrorism website



Unit 8:

Manmade Hazard Considerations

Required? No.

Recommended? Maybe...

- Where might manmade hazards show up in plans?

Local expectations

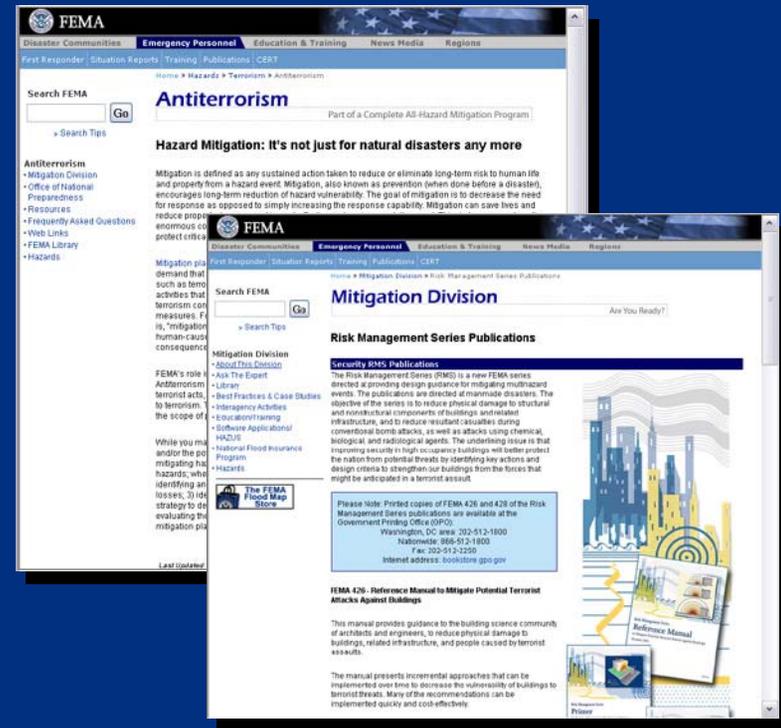
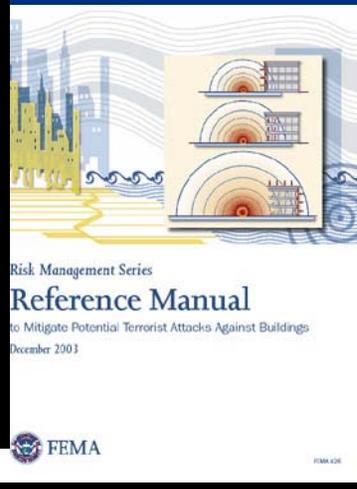
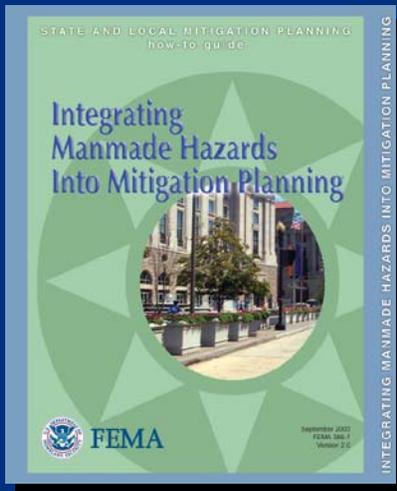
- Value of awareness



Manmade Hazard Considerations

Technical assistance

- In-house
- FEMA guidance



<http://www.fema.gov/fima/antiterrorism>

<http://www.fema.gov/fima/rmsp.shtm>



Manmade Hazard Considerations

Information sensitivity

- Legal aspects
- Public Participation
- Handling practices
- Reality check

Interagency OPSEC Support Staff
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National OPSEC Awards Program
[Award Program Overview](#)

New DVDs Have Arrived!
[\(see Awareness Products/Videos for more details\)](#)

Today in Terrorism Threat History: May 3, 2004

Japan:
Constitution adopted. (1947)

Jordan:
Armed Forces Day observed.

Upcoming Events

4-6	May	OPSEC for Public Safety Course	Greenbelt, MD
7-11	Jun	National OPSEC Conference & Exhibition	Baltimore, MD
21-25	Jun	OPSE-2380 Course	Greenbelt, MD
28-1	Jun/Jul	OPSE-2380 Course	Greenbelt, MD

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Unit 9: Odds and Ends



Odds and Ends

Questions regarding situations the Region staff have already encountered (regional differences? confidentiality?, capability assessments?)

Techniques for consistency in plan reviews

the “buddy” system

individuals filling consistent roles (one person reviews all the planning process sections, etc.)

support via FEMA HQ such as FAQ’s

NEMIS and the Plan Repository

Final Rule development and the contributions plan reviewers can make



Odds and Ends

What happens after November 1, 2004? in terms of:

monitoring implementation of the plan's recommendations
(including addressing data deficiencies)

references to plans in post-disaster situations where the plans have
been changed and/or updated but not resubmitted to FEMA

updating plans during and/or at the end of the regulatory time limits
(3 years for States and 5 years for local communities)

Planning Guidance versus Interim Criteria: can both be used or has
the Planning Guidance superceded and completely replaced the
Interim Criteria?



Unit 10: Exercise – Plan Review Comments and Plan Revisions



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



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.



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?



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”?



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.



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?



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?”



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”.



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.”



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.



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.



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 proceeded 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.



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.



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.”



Unit 11: Course Summary



Course Summary

Course Review

Feedback





FEMA