MULTI-HAZARD MITIGATION PLANNING GUIDANCE UNDER THE DISASTER MITIGATION ACT OF 2000

FEMA

Federal Emergency Management Agency
500 C Street, SW
Washington, DC 20472

Original Release March, 2004
With revisions November, 2006, June 2007 & January, 2008

TABLE OF CONTENTS

List of Acronyms iii

Introduction (*revised November, 2006*) v

Part 1 – Standard State Mitigation Plans (*revised January, 2008*) 1-1

Prerequisite 1-2
Adoption by the State: §201.4(c)(6) and §201.4(c)(7) 1-2
Planning Process 1-4
Documentation of the Planning Process: §201.4(c)(1) 1-5
Coordination Among Agencies: §201.4(b) 1-7
Program Integration: §201.4(b) 1-11
Risk Assessment 1-14
Identifying Hazards: §201.4(c)(2)(i) 1-15
Profiling Hazards: §201.4(c)(2)(i) 1-18
Assessing Vulnerability by Jurisdiction: §201.4(c)(2)(ii) 1-23
Assessing Vulnerability of State Facilities: §201.4(c)(2)(ii) 1-27
Estimating Potential Losses by Jurisdiction: §201.4(c)(2)(iii) 1-29
Estimating Potential Losses of State Facilities: §201.4(c)(2)(iii) 1-32
Mitigation Strategy 1-34
Hazard Mitigation Goals: §201.4(c)(3)(i) 1-35
State Capability Assessment: §201.4(c)(3)(ii) 1-39
Local Capability Assessment: §201.4(c)(3)(ii) 1-43
Mitigation Actions: §201.4(c)(3)(iii) 1-46
Funding Sources: §201.4(c)(3)(iv) 1-50
Coordination of Local Mitigation Planning 1-53
Local Funding and Technical Assistance: §201.4(c)(4)(i) 1-54
Local Plan Integration: §201.4(c)(4)(ii) 1-57
Prioritizing Local Assistance: §201.4(c)(4)(iii) 1-58
Plan Maintenance Process 1-60
Monitoring, Evaluating, and Updating the Plan: §201.4(c)(5)(i) 1-61
Monitoring Progress of Mitigation Activities: §201.4(c)(5)(ii) and (iii) 1-64
Severe Repetitive Loss Strategy 1-67
Repetitive Loss Mitigation Strategy 1-68
Coordination with Repetitive Loss Jurisdictions 1-70

Part 2 – Enhanced State Mitigation Plans (revised June, 2007) 2-1

Prerequisite 2-2
Compliance with Standard State Plan Requirements: §201.5(b) 2-2
Comprehensive State Hazard Mitigation Planning Program 2-4
Integration with Other Planning Initiatives: §201.5(b)(1) 2-5
Project Implementation Capability: §201.5(b)(2)(i) and (ii) 2-8
Program Management Capability: §201.5(b)(2)(iii A-D) 2-12
Assessment of Mitigation Actions: §201.5(b)(2)(iv) 2-13
Effective Use of Available Mitigation Funding: §201.5(b)(3) 2-16
Commitment to a Comprehensive Mitigation Program: §201.5(b)(4)(i-vi) 2-18

Part 3 – Local Mitigation Plans 3-1

Prerequisites 3-2
Adoption by the Local Governing Body: §201.6(c)(5) 3-2
Multi-Jurisdictional Plan Adoption: §201.6(c)(5) 3-3
Multi-Jurisdictional Planning Participation: §201.6(a)(3) 3-4
Planning Process 3-5
Documentation of the Planning Process: §201.6(b) and §201.6(c)(1): 3-6
Risk Assessment 3-9
Identifying Hazards: §201.6(c)(2)(i) 3-10
Profiling Hazards: §201.6(c)(2)(i) 3-13
Assessing Vulnerability: Overview: §201.6(c)(2)(ii) 3-17
Assessing Vulnerability: Identifying Structures: §201.6(c)(2)(ii)(A) 3-19
Assessing Vulnerability: Estimating Potential Losses: §201.6(c)(2)(ii)(B) 3-22
Assessing Vulnerability: Analyzing Development Trends: §201.6(c)(2)(ii)(C) 3-25
Multi-Jurisdictional Risk Assessment: §201.6(c)(2)(iii): 3-27
Mitigation Strategy 3-29
Local Hazard Mitigation Goals: §201.6(c)(3)(i) 3-30
Identification and Analysis of Mitigation Actions: §201.6(c)(3)(ii) 3-32
Implementation of Mitigation Actions: §201.6(c)(3)(iii) 3-36
Multi-Jurisdictional Mitigation Actions: §201.6(c)(3)(iv) 3-41
Plan Maintenance Process 3-43
Monitoring, Evaluating, and Updating the Plan: §201.6(c)(4)(i) 3-44
Incorporation into Existing Planning Mechanisms: §201.6(c)(4)(ii) 3-47
Continued Public Involvement: §201.6(c)(4)(iii) 3-49

Part 4 – Plan Review Crosswalks 4-1

Standard State Hazard Mitigation Plan Review Crosswalk ***(revised January, 2008)***
Enhanced State Hazard Mitigation Plan Review Crosswalk ***(revised June, 2007)***
Local Mitigation Hazard Mitigation Plan Review Crosswalk

LIST OF ACRONYMS

BCA	Benefit-Cost Analysis
BMPs	Best Management Practices
CDBG	Community Development Block Grant
CFR	Code of Federal Regulations
CIP	Capital Improvement Plan
CRS	Community Rating System (part of the National Flood Insurance Program)
CZM	Coastal Zone Management Program
DMA 2000	Disaster Mitigation Act of 2000
DOT	Department of Transportation
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FIS	Flood Insurance Study
FMA	Flood Mitigation Assistance Program
GIS	Geographic Information System
HMC	Hazard Mitigation Committee
HMGP	Hazard Mitigation Grant Program
HUD	US Housing and Urban Development
IBC	International Building Code
IFR	Interim Final Rule
MOU	Memorandum of Understanding
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
OMB	Office of Management and Budget
PA	Public Assistance
PDM	Pre-Disaster Mitigation Program
SBA	Small Business Administration
SHMO	State Hazard Mitigation Officer
STAPLE+E	Social, Technical, Administrative, Political, Legal, Economic, and Environmental
UCC	Uniform Construction Code

(THIS PAGE IS INTENTIONALLY BLANK)

OVERVIEW

The Disaster Mitigation Act of 2000 (DMA 2000) (P.L. 106-390) provides an opportunity for States, Tribes, and local governments to take a new and revitalized approach to mitigation planning. DMA 2000 amended the Robert T. Stafford Disaster Relief and Emergency Assistance Act (the Act) by repealing the previous Mitigation Planning section (409) and replacing it with a new Mitigation Planning section (322). This new section emphasizes the need for State, Tribal, and local entities to closely coordinate mitigation planning and implementation efforts. It continues the requirement for a State mitigation plan as a condition of disaster assistance, and creates incentives for increased coordination and integration of mitigation activities at the State level through the establishment of requirements for two different levels of State plans: "Standard" and "Enhanced." States that demonstrate an increased commitment to comprehensive mitigation planning and implementation through the development of an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program (HMGP). Section 322 also established a new requirement for Local Mitigation Plans, and authorized up to 7% of HMGP funds available to a State to be used for development of State, Tribal, and Local Mitigation Plans.

To implement the DMA 2000 planning requirements, FEMA published an Interim Final Rule (**the Rule**) in the Federal Register on February 26, 2002. This Rule (44 CFR Part 201) established the mitigation planning requirements for States, Tribes, and local communities. Normally FEMA publishes a proposed rule for public comment before publishing a final rule. This process can result in a lengthy comment and response period, during which the proposed rule is not legally effective or enforceable. Because certain types of Stafford Act assistance are conditioned on having an approved mitigation plan, FEMA wanted to publish an effective rule providing the DMA 2000 planning requirements in order to position State and local governments to receive these mitigation funds as soon as possible.

Even though it is an Interim Final Rule, FEMA will still publish a proposed rule for public comment, to be followed eventually by a final rule. FEMA is assessing the utility and practicality of these interim final requirements based on the experience of States, Tribes, and local governments, and will draw on this experience in preparing the future Proposed and Final Rules for Mitigation Planning. Until then, the Rule serves as the governing set of requirements for DMA 2000 planning implementation.

In reading the Rule, an important distinction must be made between the words "shall" and "should." When the word "shall" is used, the requirement is mandatory – e.g., "The risk assessment *shall* include: A description of the type, location, and extent of all natural hazards that can affect the jurisdiction." If the plan does not include this description, it will not be approvable by FEMA. It should also be noted that the word "must" carries the same mandatory nature as the word "shall." For example, "The plan *must* be … resubmitted for approval to the appropriate Regional Director every three years." This is a mandatory requirement.

When the word "should" is used, the item is strongly recommended to be included in the plan, but its absence will not cause FEMA to disapprove the plan. For example, where the Rule says, "The plan *should* describe vulnerability in terms of … the types and numbers of existing and future buildings …" this information would make the plan more useful, but the plan could still be approved if it is not included (assuming the plan met all the mandatory requirements).

The use of the words "should," "shall," and "must" in this *Multi-Hazard Mitigation Planning Guidance* is consistent with the use of those words in the Rule. In the Plan Review Crosswalks found in Section 4, the "should" requirements are shaded, as a reminder that they are not required for plan approval.

To help States, Tribes, and local governments better understand the Rule and meet the DMA 2000 planning requirements, FEMA has prepared this document, *Multi-Hazard Mitigation Planning Guidance Under the Disaster Mitigation Act of 2000 (Multi-Hazard Mitigation Planning Guidance).* It was designed with three major objectives:

- To help Federal and State reviewers evaluate mitigation plans from different jurisdictions in a fair and consistent manner;
- To help States, Tribes, and local jurisdictions develop new mitigation plans or modify existing ones in accordance with the requirements of the Rule, and
- To help States, Tribes, and local jurisdictions conduct comprehensive reviews and prepare updates to their plans in accordance with the review and update requirements of the Rule.

This *Multi-Hazard Mitigation Planning Guidance,* as interpretation and explanation for the Rule, is FEMA's official source for defining the requirements of original and updated mitigation plans. It includes references to specific language in the Rule, descriptions of the relevant requirements, and sample plan text to illustrate distinctions between plan approaches that would and would not meet DMA 2000 requirements. In addition, this document provides references to a number of planning tools that FEMA has made available to assist

States, Tribes, and localities in developing a comprehensive, multi-hazard approach to mitigation planning, and in preparing plans that will meet the DMA 2000 requirements. These tools include:

- *State and Local Mitigation Planning How-to Guides* – intended to help States and communities plan and implement practical, meaningful hazard mitigation actions (FEMA 386-1,2,3,4,5,6,7 and 8); available on the FEMA Web site at https://www.fema.gov/media-library/resources-documents/collections/6.
- *Planning for a Sustainable Future* (FEMA 364) - provides guidance for integrating hazard mitigation and sustainable practices as part of pre- and post-disaster mitigation planning efforts; available on the FEMA Web site at https://www.fema.gov/media-library/assets/documents/2110?id=1541.
- *Multi-Hazard Identification and Risk Assessment*, available on the FEMA Web site at https://www.fema.gov/media-library/assets/documents/7251.
- *FEMA Mitigation Resources for Success* (FEMA 372) – a compact disc (CD) with a compendium of FEMA resources related to mitigation practices and projects; and
- *Mitigation Benefit Cost Analysis (BCA) Toolkit Compact Disc* – this CD includes all the FEMA BCA software, technical manuals, BCA training course documentation, and other supporting material and BCA guidance. Copies can be obtained by calling FEMA's toll-free BC Hotline at 866-222-3580.

These publications, with the exception of the BCA Toolkit CD, can be ordered through the FEMA Publications Warehouse at 800-480-2520 or online at FEMA's Information Resource Library https://www.fema.gov/resource-document-library.

FEMA recently made available HAZUS-MH (Hazards U.S. – Multi-Hazard), a risk assessment software program. For more information, go to https://www.fema.gov/hazus/.

In addition, FEMA has developed the DMA 2000 Mitigation Planning Workshop for Local Governments (G318), based on the *Multi-Hazard Mitigation Planning Guidance* and the reference material described above. You can obtain information on this course from your FEMA Regional Office.

Special Considerations:

It should be noted that DMA 2000 specifically requires mitigation planning for *natural hazards*, but not for manmade hazards. However, FEMA supports those jurisdictions that choose to consider *technological and manmade hazards* in their respective mitigation plans. While it is true that a State, Tribal, or Local Mitigation Plan can be approved under the Act without consideration of these hazards, the *Multi-Hazard Mitigation Planning Guidance* can be helpful in developing and evaluating plans that include these hazards as part of a comprehensive hazard mitigation strategy. For more information on integrating technological and manmade hazards in mitigation plans, please see: *Integrating Manmade Hazards into Mitigation Planning* (FEMA 386-7); available at https://www.fema.gov/media-library/assets/documents/4528.

DMA 2000 MITIGATION PLANNING PROVISIONS

As a result of FEMA's previous mitigation planning requirements, such as State planning under Section 409 of the Stafford Act, and plan requirements associated with the Flood Mitigation Assistance (FMA) Program of the National Flood Insurance Program (NFIP), States and many communities have developed hazard mitigation plans. The most successful of these plans—where practical, meaningful mitigation actions have been the result—have two common elements:

- Comprehensive risk and capability assessments that form a solid foundation for decision making; and
- Input from a wide range of stakeholders who would play a role during implementation of recommended mitigation actions at the Federal, State, and local levels.

Accordingly, the Disaster Mitigation Act of 2000 emphasizes greater interaction between State and local mitigation planning activities, and highlights the need for improved linkage of hazard and capability analyses to State and local hazard mitigation strategies. At the same time, FEMA has a continuing interest in streamlining the mitigation planning and implementation process. The implementation of planned, pre-identified, cost-effective mitigation actions based on a sound hazard identification and assessment of risk will make a major contribution to such streamlining.

The DMA 2000 mitigation planning provisions, along with other sections of the Act, provide a significant opportunity to reduce the Nation's disaster losses. The language in the Act, taken as a whole, emphasizes the importance of strong State, Tribal, and local planning processes, and comprehensive mitigation program management at the State level. FEMA strongly believes that with hazard mitigation planning, as with most other planning efforts, the actual process of planning is as important as the resultant plan. Therefore, we consider the plan as the written record, or documentation, of the planning process. This is why some of the plan requirements ask for a "discussion" or "description" of a

process or development of a planning product (such as goals, or hazard identification).

To emphasize the importance of the process, we have taken, to the extent possible, a "performance standard," rather than a "prescriptive" approach to the planning requirements. This means that the requirements are designed to identify, generally, *what* should be done in the process and documented in the plan, rather than specify exactly *how* it should be done. This approach recognizes and appreciates the inherent differences that exist among State, Tribal, and local governments with respect to size, resources, capability, and vulnerability.

Specifically, DMA 2000 enacted the following provisions relative to mitigation planning:

Standard State Mitigation Plans (§201.4 of the Rule): States with an approved Standard State Mitigation Plan will qualify for HMGP funding based on 15% for amounts not more than $2,000,000,000, 10% for amounts of more than $2,000,000,000 and not more than $10,000,000,000, and 7.5% on amounts of more than $10,000,000,000, and not more than $35,333,000,000 of the total estimated eligible Stafford Act disaster assistance (new formula per Post-Katrina Emergency Management Reform Act of 2006, October 2, 2006). Generally, States are required to coordinate mitigation planning with Tribal and local jurisdictions, and document funding and technical assistance they will provide to these jurisdictions. More specifically, §201.4 requires that plans meet the following basic requirements to receive approval:

- ✓ describe how the State coordinates with local mitigation planning efforts;
- ✓ develop a mitigation strategy based on local and State vulnerability analyses and risk assessments;
- ✓ describe how the State provides funding or technical assistance to local governments;
- ✓ discuss how the State prioritizes jurisdictions that will receive mitigation planning and project grants and other State assistance; and
- ✓ establish a plan maintenance process.

- **Enhanced State Mitigation Plans** (§201.5 of the Rule): States that have an approved Enhanced State Mitigation Plan at the time of a disaster declaration will qualify to receive HMGP funds based on up to 20% of the total estimated eligible Stafford Act disaster assistance. Specifically, §201.5 requires that Enhanced Plans meet all the requirements of the Standard Plan and in addition:

  - ✓ demonstrate a broad, programmatic mitigation approach, and

- ✓ demonstrate a systematic and effective administration and implementation of existing mitigation programs.

- **Local Mitigation Plans** (§201.6 of the Rule): Local jurisdictions must also demonstrate that proposed mitigation actions are based on a sound planning process that accounts for the inherent risk and capabilities of the individual communities.

- **Tribal Mitigation Plans:** Tribal governments will have the opportunity to fulfill the planning requirements either as a grantee or as a subgrantee.

- **Funding for Plan Development:** DMA 2000 authorizes up to 7% of available HMGP funds for State, Tribal, or local planning purposes. Also, funds from the Pre-Disaster Mitigation (PDM) program may be used to develop mitigation plans, and the FMA program provides annual grant funds for flood mitigation planning. Other agencies have funding available that may be used for hazard mitigation planning. For example, the National Oceanic and Atmospheric Administration's Coastal Zone Management (CZM) Program has funded coastal hazard mitigation activities, including planning.

- **Deadlines and Requirements for Regular Plan Reviews and Updates:** In order to apply for a FEMA PDM **project** grant, Tribal and local governments must have a FEMA-approved mitigation plan. Tribal and local governments must have a FEMA-approved mitigation plan in order to receive HMGP **project** funding for disasters declared on or after November 1, 2004. States and Tribes must have a FEMA-approved Standard or Enhanced Mitigation Plan in order to receive non-emergency Stafford Act assistance (i.e., Public Assistance categories C-G, HMGP, and Fire Management Assistance Grants) for disasters declared on or after November 1, 2004. State mitigation plans must be reviewed and reapproved by FEMA every three years. Local Mitigation Plans must be reviewed and reapproved by FEMA every five years.

- **Plan updates**. In addition to the timelines referenced above, the Rule includes the following paragraphs that pertain directly to the update of State and local plans,

  - ✓ §201.3(b)(5) [FEMA Responsibilities]…Conduct reviews, at least once every three years, of State mitigation activities, plans, and programs to ensure that mitigation commitments are fulfilled….

  - ✓ §201.4(d) *Review and updates*. [State] Plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities and resubmitted for approval…every three years.

- ✓ §201.6(d) [Local] plans must be reviewed, revised if appropriate, and resubmitted for approval within five years in order to continue to be eligible for…project grant funding.

Plan updates must demonstrate that progress has been made in the past three years (for State plans), or in the past five years (for local plans), to fulfill commitments outlined in the previously approved plan. This will involve a comprehensive review and evaluation of each section of the plan and a discussion of the results of evaluation and monitoring activities detailed in the *Plan Maintenance* section of the previously approved plan. FEMA will leave to State discretion, consistent with this plan update guidance, the documentation of progress made. Plan updates may validate the information in the previously approved plan, or may involve a major plan rewrite. In any case, a plan update is NOT an annex to the previously approved plan; it must stand on its own as a complete and current plan.

States may determine, consistent with this guidance, the type and level of detail of local plan information that they incorporate into the State plan. A guiding principle is that the documentation provided be sufficient to maintain the effectiveness of the plan as a primary and up to date tool for risk reduction.

NEW REGULATION FOR FLOOD INSURANCE REFORM ACT OF 2004 AND TRIBAL PLANNING PROVISIONS

The Flood Insurance Reform Act of 2004 (P.L. 108-264) created two new grant programs, Severe Repetitive Loss (SRL) and Repetitive Flood Claims (RFC), and modified the existing Flood Mitigation Assistance (FMA) program. The RFC is currently being implemented through guidance. FEMA has prepared a regulation to implement the new SRL and changes to the FMA program, and anticipates it to be published during the summer of 2007. The regulation is *expected* to have the following impacts on State and local mitigation planning:

- The SRL program will require a local mitigation plan as a condition of project grants (consistent with other grant programs).
- Provide criteria for provisions of State mitigation plans which, if included in these plans, will increase the Federal cost share to 90/10 for mitigation of severe repetitive loss properties funded under the FMA and SRL programs.
- Clarifies criteria for local plans: one plan will be required for all mitigation programs (i.e., HMGP, PDM, FMA, and the new SRL).

Included in the updated regulation is a new section for tribal mitigation plans. Previously, Indian tribal governments could develop plans under either the State or local criteria, although neither of these options has sufficiently met the needs of these governments. The new section will accommodate some of the issues relating to Indian tribal governments, and streamline their roles and responsibilities with respect to mitigation planning. Implementation of the tribal mitigation planning section will be phased in over time, so that plans under development when the regulation is published will not be impacted by any changes.

FEMA will provide guidance for States and local and Indian tribal governments on meeting the requirements of this new regulation shortly after it is published.

USING THE *MULTI-HAZARD MITIGATION PLANNING GUIDANCE*

Organization of the Multi-Hazard Mitigation Planning Guidance

The *Multi-Hazard Mitigation Planning Guidance* is divided into four sections following this Introduction. Parts 1, 2, and 3 address the requirements for the Standard State, Enhanced State, and Local Plans, respectively. These sections contain the language of the Rule, an explanation clarifying the intent of the Rule requirements, excerpts of plans to illustrate application of the requirements, and references to a series of resources that address particular planning issues in more detail. Section 4 contains Plan Review Crosswalks for scoring each of these three types of plans.

For Part 1 - Standard State Plans, and Part 2 – Enhanced State Plans, guidance relating to updating the plans has been incorporated for each regulatory requirement directly underneath the original explanation, and is labeled Plan Update. **It is important to note that the updated plan must meet the requirements of the original explanations as well as the update guidance explanation.** The update guidance is meant to highlight issues that apply specifically to those plans being updated, and is intended to complement – not replace – the original guidance. In some cases, the original explanation has been revised to provide further clarification. Where such revisions have been made, a note with the date of the revision has been placed in the left margin next to the new language. As stated earlier, the previously approved plan may not necessarily need comprehensive or significant revision for the update. The update process requires that each section be reviewed and evaluated to ensure that it is still valid, or to establish that it needs to be revised and brought up to date.

NOTE: At this time (June 2007), the examples for the Standard and Enhanced Plans have <u>not</u> yet been revised. The reader is cautioned not to confuse the terms “Required Revisions” and “Revised Submittal” that are used in the examples with the new language for the “Plan Update.”

The Part 4 Plan Review Crosswalk for Standard State Plans and Plan Review Crosswalk for Enhanced State Plans have been revised to reflect the new plan update language added to the explanations in Parts 1 and 2. New elements have been added to the crosswalk in those cases where the existing crosswalk elements were insufficient for plan updates. In other cases, the update requirement is covered by minor changes in the wording of the original requirement.

This June 2007 document includes plan update guidance and requirements for Standard State Plans and Enhanced State Plans only. Similar guidance for updating Local Mitigation Plans is being prepared. The next version of this Multi-Hazard Mitigation Planning Guidance will include guidance for updating Local Plans.

The Rule is as published at 44 CFR 201. Language in brackets does not appear in the Rule, but has been added to provide the proper context. For example: *[The plan must include] a description of the planning*

process. An ellipsis has been used to indicate that other phrases precede or follow the requirement language. For example: *… using maps where appropriate*.

Plan Evaluation Methodology

The *Multi-Hazard Mitigation Planning Guidance* outlines a process for the review of State and Local Mitigation Plans based on the requirements described in the Rule. The Plan Review Crosswalks in Section 4 of this document are important tools in both the review and development of complete plans, as they mirror the requirements in the Rule. Standard State Plans must meet the prerequisites and receive a score of "Satisfactory" for each requirement for the plan to be approved. To be approved as an Enhanced State Plan, a score of "Satisfactory" must be attained for all Standard and Enhanced requirements. Local Plans must be submitted to the State Hazard Mitigation Officer for initial review and coordination, before submittal to the appropriate FEMA Regional Office for formal review and approval. Local Plans must also receive a score of "Satisfactory" for all requirements to be approved.

Except for prerequisites that must be met before the plan can be approved, the reviewer must score requirements based on the following scoring system:

N **Needs Improvement:** The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

S **Satisfactory:** The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

The final, completed Plan Review Crosswalk provides the State, Tribe, or local jurisdiction with:

- a score for each requirement;
- reviewer comments for requirements that need improvement; and
- a determination of whether the plan is approved by FEMA (and the State, if a Local Plan).

In those cases where FEMA reviewers provided "recommended revisions" for those requirements that the previously approved plan met, the plan update process provides an excellent opportunity to incorporate these recommendations into the revised plan. When FEMA reviews the updated plan, it will assess whether and how the plan addresses these recommendations, although it is not required that the plan does so.

Special Considerations:

When reviewing plans, the evaluator may find it helpful to first read the plan and identify the appropriate sections that correspond to the Rule's requirements. The Plan Review Crosswalks include a column (second from left), "Location in the Plan," that the State, Tribe, or jurisdiction submitting the plan can complete to assist reviewers in determining where in the plan the requirements are addressed.

Special Considerations:	With the concurrence of FEMA Regions, States can insert additional State planning requirements, tailoring *Part 3 – Local Mitigation Plans* of the *Multi-Hazard Mitigation Planning Guidance* to account for State-specific requirements.

PLAN SUBMITTAL AND REVIEW PROCEDURES

Plan Submittal Procedures

State Plans

FEMA Regional Offices will work with States to identify procedures and schedules that will facilitate plan review, technical assistance, and approval. The following *recommended* approaches may be helpful:

- The State may share drafts of the entire plan, or at least the results of the risk assessment (because of the importance of the risk assessment to the quality of the overall plan), with FEMA well in advance of finalizing the plan. Early FEMA feedback will let the State know either that it is on the right track, that additional material needs to be added, or that major revisions need to be made in time to develop and submit an approvable plan by established deadlines.

- The State is strongly encouraged to submit a final draft to FEMA for review **before** seeking formal adoption of the plan by the appropriate officials, agencies, or organizations. If FEMA determines that the plan is "approvable pending adoption," i.e., the plan meets all requirements except for the formal adoption and final submittal, the State can then proceed with the adoption process, knowing the adopted plan will be approved. If there are deficiencies in the plan, the responsible parties will be able to address them before taking the plan through adoption, and avoid the potentially awkward situation of having an adopted plan not be approved.

- Once the State obtains FEMA approval of the final draft, it can then proceed with formal adoption, and submit the adopted plan to FEMA for formal approval.

- States should consult with their FEMA Regional Office early enough to ensure that they will be able to obtain FEMA review and approval of their plans in time to meet established deadlines.

Local Plans

The Rule requires that Local Plans be submitted to the State Hazard Mitigation Officer for initial review and coordination, with the State then forwarding the plans to FEMA for formal review and approval. The following *recommended* approaches may be helpful:

- States and communities should coordinate with each other to identify procedures and schedules that will facilitate State support of local planning efforts and initial review of Local Plans.

- Local jurisdictions may share drafts of their entire plan, or at least the results of the risk assessment (because of the importance of the risk assessment to the quality of the overall plan), with the State well in advance of finalizing the plan. Early feedback from the State will let the jurisdiction know that it is on the right track, that additional material needs to be added, or that major revisions need to be made in time to develop and submit an approvable plan by established deadlines.

- Local jurisdictions are strongly encouraged to submit a final draft to the State and FEMA for review **before** seeking formal adoption of the plan by the appropriate officials, agencies, or organizations. If FEMA determines that their plan is "approvable pending adoption," i.e., the plan meets all requirements except for the formal adoption and final submittal, they can then proceed with the adoption process, knowing the adopted plan will be approved. If there are deficiencies in the plan, the responsible parties will be able to address them before taking the plan through adoption, and avoid the potentially awkward situation of having an adopted plan not be approved.

- Once FEMA approves the final draft of the plan, the local jurisdiction can then proceed with formal adoption, and submit the adopted plan to FEMA for formal approval.

- Local jurisdictions should consult with their State Hazard Mitigation Officer early enough to ensure that they will be able to obtain FEMA review and approval of their plans in time to meet established deadlines.

Tribal Plans

The modifications to the planning regulation are expected to provide a new section for tribal mitigation plans. This will allow Tribal governments to develop a single plan that will satisfy the mitigation grant program requirement, and will allow them to apply directly to FEMA as a grantee, or through the State as a subgrantee.

FEMA Regional Offices will work with tribal governments to identify procedures and schedules that will facilitate plan review, technical

assistance, and approval. The following *recommended* approaches may be helpful:

- Indian tribal governments may share drafts of the entire plan, or at least the results of the risk assessment (because of the importance of the risk assessment to the quality of the overall plan), with FEMA well in advance of finalizing the plan. Early FEMA feedback will let the tribal government know either that it is on the right track, that additional material needs to be added, or that major revisions need to be made in time to develop and submit an approvable plan by established deadlines.

- Tribal governments are strongly encouraged to submit a final draft to FEMA for review **before** seeking formal adoption of the plan by the appropriate officials, agencies, or organizations. If FEMA determines that the plan is "approvable pending adoption," i.e., the plan meets all requirements except for the formal adoption and final submittal, the tribal government can then proceed with the adoption process, knowing the adopted plan will be approved. If there are deficiencies in the plan, the responsible parties will be able to address them before taking the plan through adoption, and avoid the potentially awkward situation of having an adopted plan not be approved.

- Once the tribal government obtains FEMA approval of the final draft, it can then proceed with formal adoption, and submit the adopted plan to FEMA for formal approval.

Tribal governments should consult with their FEMA Regional Office early enough to ensure that they will be able to obtain FEMA review and approval of their plans in time to meet established deadlines.

Timeframe for Review

Once a final plan is submitted, the FEMA Regional Office will complete the review within 45 days from the day it is received, *whenever possible*. In the event that the plan is not approved, the Regional Office will provide comments on the areas that need improvement.

Plan Updates

States should develop a schedule that allows for the plan (Standard and/or Enhanced) update and approval process to occur within three years from the last approval date. Local jurisdictions should develop a schedule that allows a plan update and approval to occur within five years from the last approval date. Tribal plans developed as State level plans will have a three-year update schedule; Tribal plans developed as local level plans will follow the five-year update schedule. [This will be updated to reflect the new regulation.] All jurisdictions should consider the time needed for State and/or FEMA reviews as well as time that may be needed for make required changes identified in the reviews ahead of the deadline. It should be noted that States could choose to establish a schedule for more frequent Local Plan updates.

Special Considerations:	FEMA no longer requires States to revise their mitigation plan after every disaster declaration, as it did under former section 409 of the Stafford Act. We do, however, recommend that States consider updating their plans whenever a disaster or other circumstances significantly affect its mitigation priorities. Additionally, because the State Administrative Plan required under the HMGP (44 CFR 206.437) must be updated for each new disaster, States may prefer to maintain it separately from the mitigation plan. The Administrative Plan could reference the mitigation priorities identified in the mitigation plan, in order to satisfy the Administrative Plan requirement to establish priorities for the selection of mitigation projects.

PART 1 – STANDARD STATE MITIGATION PLANS

The mitigation plan demonstrates the State's commitment to reducing the risks from natural hazards, and should serve as a guide for all levels of State decision makers. The plan should detail how the State will address planning for natural hazards and the resources they are going to commit to the process.

The Plan, whether a first-time submittal or an updated plan, must meet certain basic requirements to receive approval, including:

- The mitigation strategy should be based on local and State vulnerability analyses and risk assessments.
- The State must describe how they will coordinate with local mitigation planning efforts.
- The State must describe how they will provide funding or technical assistance to local governments.
- The State must discuss how they will prioritize jurisdictions that will receive mitigation planning and project grants and other State assistance.
- There must be a formal plan maintenance process.

Each requirement must receive a satisfactory score for the plan to be approved. Each State submitting a hazard mitigation plan must meet the Prerequisite – Adoption by the State, before the plan can be approved by FEMA.

In those cases where FEMA reviewers provided "recommended revisions" for those requirements that the previously approved plan met, the plan update process provides an excellent opportunity to incorporate these recommendations into the revised plan. When FEMA reviews the updated plan, it will assess whether and how the plan addresses these recommendations, although it is not required that the plan does so.

The sections covered in Part 1 – Standard State Mitigation Plans include:

- Prerequisite – Adoption by the State
- Planning Process
- Risk Assessment
- Mitigation Strategy
- Coordination of Local Mitigation Planning
- Plan Maintenance Process
- Severe Repetitive Loss Strategy

PREREQUISITE

ADOPTION BY THE STATE

Requirement §201.4(c)(6) and §201.4(c)(7):

The plan must:

- be formally adopted by the State prior to submittal to [FEMA] for final review and approval [and]
- include assurances that the State will comply with all applicable Federal statutes and regulations in effect with respect to the periods for which it receives grant funding, in compliance with 44 CFR 13.11(c). The State will amend its plan whenever necessary to reflect changes in State or Federal laws and statutes as required in 44 CFR 13.11(d).

Explanation:

An appropriate body in the State **must** adopt the plan. This could be, for example, the State Legislature or the Governor, depending on the State's established procedures. States with hazard mitigation teams or councils may choose to use these bodies to adopt the plan. At a minimum, the plan **must** be endorsed by the director of the State agency responsible for preparing and implementing the plan, as well as the heads of other agencies with primary implementation responsibilities.

Adoption by the State:

- Demonstrates the State's commitment to fulfilling the mitigation objectives outlined in the plan.
- Legitimizes the plan and authorizes the responsible agencies identified in the plan to execute their responsibilities.

The section on assurances relates to the State's understanding and accountability in complying with Federal statutes and regulations in effect when it receives grant funding as prescribed in 44 CFR 13.11(c).

Additionally, as required in 44 CFR 13.11(d), the State **must** amend its plan to reflect new or revised Federal regulations or statutes, or changes in State law, organization, policy, or State agency operation. The amendment can be added as an annex to the plan and later incorporated into the appropriate section(s) when the plan is formally updated as required in §201.4(d) of the Rule.

The resolution of adoption can include a statement assuring FEMA that the State will comply with both of these CFR requirements.

The plan **must** include a copy of the resolution of adoption.

Plan Update:

An appropriate body in the State **must** adopt the updated plan regardless of the degree of modifications to the original plan.

Resource: For more information about adopting a mitigation plan, see:

- ✓ *Bringing the Plan to Life (*FEMA 386-4), Step 1.

Scoring:

- ❑ Not Met. The plan has not been formally adopted by the State.
- ❑ Not Met. The plan has been formally adopted by the State, but a copy of the signed resolution is not included.
- ❑ Met. The plan has been formally adopted by the State, and a copy of the signed resolution is included.

PLANNING PROCESS

§201.4(b) recommends that the State coordinate with other State agencies, appropriate Federal agencies, and interested groups during the planning process. Early involvement of other parties provides the opportunity for integration of mitigation actions with other planning efforts. It also allows for building partnerships with other agencies and interested groups to facilitate data gathering, analysis, and later implementation of mitigation strategies. §201.4(c)(1) requires that the State document this planning process.

The planning process is the heart of both the original mitigation plan and updates to that plan. In a plan update, the description of the planning process is intended to inform the reader what steps the planning team took to review, evaluate, and update each section of the plan, as well as provide the rationale for sections that were not changed. It should be based on the update process described in the plan maintenance section of the previously approved plan. This is the blueprint for constructing the updated plan, and instills within it a necessary continuity.

States may experience fluctuations in staffing and in-house knowledge of the hazard mitigation planning process. The description of the planning process will be especially valuable to new staff and successive leaders as it provides a clear and coherent picture of the steps taken to update the plan. Also, during intense decision-making situations, such as the period following a catastrophic event[1], an understanding of the planning process and the rationale used to develop the risk assessment and mitigation strategy will be of assistance as mitigation priorities are reassessed and revised.

This section includes the following three subsections:

- Documentation of the Planning Process
- Coordination Among Agencies
- Program Integration

[1] *any large scale event, the result of either man made or natural hazards, that, for a protracted period, affects governments' ability to conduct and deliver the day to day civil functions and services, and has long-term consequences for the local, state or national economy.*

DOCUMENTATION OF THE PLANNING PROCESS

Requirement §201.4(c)(1):

[The State plan must include a] description of the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how other agencies participated.

Explanation:

A description of the planning process **must** include how the planning team or committee was formed, how input was sought from individuals or other agencies, and how the plan was prepared.

Plan Update:

A description of the planning process is required for the update. The update **must** describe the process used to review and analyze each section of the plan. If the planning team or committee finds that some sections of the plan warrant an update, and others do not, the process the team undertook to make that determination **must** be documented in the plan.

Resource:

For more information on the planning process, see:

- ✓ *Getting Started* (FEMA 386-1), Steps 1 – 4.

Examples:

N/S

Original Submittal:

The State Hazard Mitigation Plan (the Plan) was prepared by the State Hazard Mitigation Section. This section, created in 2001 and headed by the State Hazard Mitigation Officer, is responsible for leading and coordinating mitigation and long-term redevelopment efforts.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(1)		▪ The description does not provide details on how various parties were involved in the planning process, what meetings were held to solicit involvement, how long the process took, etc. ▪ The plan was prepared by only one State agency, with no mention of participation by other agencies or groups.

Required Revisions:

For a "Satisfactory" score, the plan must provide more details on how the plan was prepared and what agencies were involved.

N S

Revised Submittal:

The State Hazard Mitigation Plan (the Plan) was prepared by the State Hazard Mitigation Section. This section, created in 2001 and headed by the State Hazard Mitigation Officer, is responsible for leading and coordinating mitigation and long-term redevelopment efforts. **The Hazard Mitigation Section organized a Hazard Mitigation Committee (HMC), composed of 14 representatives from Federal and State agencies, as well as local governments, the private sector, and non-profit and civic organizations to assist the section in preparing the Plan (see pages X, Y, and Z for a list of these agencies). Not all invited civic or non-profit groups or business leaders agreed to join the HMC. However, two regional public forums were organized: one at the beginning of the planning process to elicit concerns and solicit ideas; and a second public forum was held for the general public to review and comment on the draft plan. These forums were widely publicized in local newspapers, and flyers were mailed to agencies that had expressed an interest in participating in some capacity. Citizens and interested groups could also access the State public Web site to review the draft plan and provide comments online. The HMC met every two weeks for the first three months and later once per month. The plan was completed over a 12-month period.**

COORDINATION AMONG AGENCIES

The [state] mitigation planning process should include coordination with other State agencies, appropriate Federal agencies, interested groups, and … .

Explanation: In order to encourage States to develop plans that will be used as guides for statewide mitigation activities, and for citizens and the private sector to support such activities, the Rule recommends States demonstrate coordination with all levels of government, and representatives from the private and non-profit sectors. The plans *should* describe how the State interacted with Federal, State, regional, and local agencies, as well as other interested parties such as business, industry, and professional associations, non-profit groups, and community representatives in the development of the plan.

Of particular importance is the participation by agencies and groups that can contribute resources to prepare the plan and by agencies that will likely implement mitigation actions. By including these agencies in the planning process, the State can build partnerships that will facilitate the implementation phase of the plan. Merely contacting agencies to solicit input or sending a draft plan for an agency to review does not constitute active participation. Participants *should* play an active role throughout the planning process and, whenever possible, be involved from the beginning. The State *should* identify additional participants as opportunities arise (e.g., after a disaster).

Examples of how coordination may be demonstrated:

- Description of outreach efforts to engage interested parties.
- Description of the types and frequency of meetings of task forces and committees, inter-disciplinary/inter-agency mitigation planning teams, or with interested agencies and private sector organizations.
- Discussion of the nature of the Memoranda of Understanding (MOU) or other work agreements.
- Description of how interested parties who could not participate on a regular basis were kept informed and how they provided comments.

Plan Update: The updated plan *should* describe how the State interacted with all levels of government as indicated above. It *should* also describe how coordination among agencies changed since approval of the previous plan.

Resource: For information on establishing a mitigation planning team and building partnerships, see:

✓ *Getting Started* (FEMA 386-1), Step 2.

Examples:

Original Submittal:

The State Hazard Mitigation Committee (HMC) distributed the mitigation plan to other State, Federal, and local agencies. Each participating agency had an opportunity to comment on preliminary and draft versions of the plan. The HMC incorporated appropriate comments and distributed a final copy of the plan to the participants.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(b)		▪ Coordination only involved notification of other government agencies. ▪ No effort was documented regarding contacting or soliciting involvement from civic, private, or not-for profit groups, including those known to assist in the event of disasters.

Required Revisions:

A "Needs Improvement" score on this requirement will not preclude the plan from passing. For a "Satisfactory" score, the mitigation plan must demonstrate that the planning process included active coordination with and participation by other agencies and/or groups.

Special Considerations:

This may not be an easy item to "fix" if adequate coordination has not occurred to date. The State would have to take its plan back for review by potential participants and revise the content according to their input. This could be a substantial effort. On the other hand, if the State actually did the coordination, but did not describe it adequately, then the State needs to do a better job of documenting its coordination effort.

Revised Submittal:

The State Hazard Mitigation Committee (HMC) ~~distributed~~ **coordinated the development of** the mitigation plan ~~to~~ **with** other State, Federal, and local agencies. **The HMC, on behalf of the Governor, also solicited participation from industry associations, volunteer agencies, and other private and non-profit sector representatives. Fourteen representatives in total committed their time and available resources to develop a mitigation strategy that would protect life, property, and the environment as well as contribute to the economic well being of the State.**

Each participating agency **and group presented its programs, identified mitigation opportunities, and subsequently** had an opportunity to comment on preliminary and draft versions of the plan. **The HMC jointly reviewed each agency's function and identified more opportunities, including some applicable to agencies not present.** The HMC incorporated appropriate comments and distributed a final copy of the plan to the participants.

Agency	Designated Responsibilities
State Office of Natural Resources	To review mitigation project applications and plans to ensure their environmental soundness.
State Building Code Office	To provide information about State building code requirements and best construction practices.
State Office of Economic Development	To identify opportunities to promote economic development through mitigation initiatives. To act as a liaison between local economic development agencies and the HMC to identify ways in which economic development initiatives can encourage mitigation.
State Office of Emergency Management	To coordinate mitigation planning and project implementation. To serve as a liaison between FEMA's Federal Insurance and Mitigation Administration and the HMC.
State Public Works and Utility Office	To help local communities identify mitigation actions for public infrastructure. To identify state resources and infrastructure vulnerable to hazards.
State Department of Transportation	To help local communities identify mitigation actions for State roads and bridges. To identify state resources and infrastructure vulnerable to hazards.
State Planning Office	To educate local governments (specifically local planning departments) on new hazard mitigation planning requirements and to aid in the incorporation of mitigation concerns into local comprehensive planning efforts.
State Historic Preservation Office	To help communities identify ways to mitigate hazards that threaten historic resources in their communities. To assist communities identified in Section 106 review processes for mitigation projects in compliance with Federal and State historic preservation regulations.

Agency	Designated Responsibilities
State Parks Association	To identify resources for acquiring funding to create green- and open-spaces as mitigation actions.
Association of Homebuilders	To represent private development interests and concerns in relation to mitigation projects and regulations.
Manufactured Housing Association	To identify best practices in constructing or reconstructing low-cost, manufactured housing threatened by hazards.
Big River Watershed Society	To coordinate efforts to improve water quality, recreation activities, and other concerns with State mitigation activities.
State Association of Disaster Relief	To provide insight into mitigation actions as they relate to response and recovery.
State Association of County Govt.	To liaison between HMC and local governments about hazard mitigation planning requirements. To educate local officials about the resources available for mitigation planning assistance and training.

PROGRAM INTEGRATION

[The State mitigation planning process should] be integrated to the possible with other ongoing State planning efforts, as well as other FEMA mitigation programs and initiatives.

Explanation: Coordination can result in identifying opportunities to integrate planning efforts and mitigation actions. FEMA has found that mitigation plan implementation is most effective when States integrate mitigation planning efforts with those of other State planning programs and initiatives.

States might demonstrate that they have made efforts at integration by:

- Reviewing existing plans and reports to identify opportunities to integrate mitigation actions.
- Having mitigation planners/specialists serve on other State program and planning teams.
- Consolidating the planning requirements for all State mitigation programs (e.g., HMGP, FMA, CRS, local comprehensive plans, and land use plans).
- Identifying overall goals or priorities common to other State planning efforts.
- Requesting that legislation be passed or issuing an Executive Order mandating integration of mitigation actions into other planning initiatives.
- Outlining the State's approach and providing a timeline for integrating actions.
- Describing actual ongoing efforts where mitigation actions have been integrated into planning mechanisms (e.g., comprehensive plans, capital improvement plans, and emergency operation plans) and implementation tools (e.g., building codes, floodplain ordinances, and land use regulations).

Plan Update: In addition to discussing what integration efforts have taken place to date, the update *should* discuss State planning integration efforts and opportunities that were identified in the previously approved plan, and any unforeseen obstacles that emerged since approval of the previous plan.

Resource: For information on integrating hazard mitigation actions with other initiatives, see:

- ✓ *Bringing the Plan to Life* (FEMA 386-4), Step 2.

Examples:

Original Submittal:

The State Hazard Mitigation Committee (HMC) reviewed several State agencies' plans to identify programs and policies that promote hazard mitigation.

Twenty communities currently participate in the Community Rating System (CRS), part of the National Flood Insurance Program. Each has prepared a flood mitigation plan and has received funding for flood mitigation projects.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(b)		▪ The plan does not describe all programs or policies examined, nor does it identify the mitigation efforts to be integrated into the State's CRS program.

Required Revisions:

A "Needs Improvement" score on this requirement will not preclude the plan from passing. For a "Satisfactory" score, the mitigation plan must document how mitigation actions are integrated into other State planning efforts as well as Federal mitigation programs.

Revised Submittal:

The State Hazard Mitigation Committee (HMC) reviewed several State agencies' plans to identify programs and policies that **currently** promote ~~hazard mitigation~~ **or could potentially further mitigation initiatives around the State (see Table XX for a summary of these findings).**

One program the State is implementing is the Growing Smart Initiative, administered by the Division for Sustainable Development in the State Department of Planning and Development. The Growing Smart Initiative has several components related to hazard mitigation, including funding to encourage local governments to remove structures from high hazard areas, creating open space in environmentally sensitive areas such as the 100-year floodplain, and providing financial incentives to encourage businesses to upgrade facilities in central business districts. The HMC will continue its efforts to integrate hazard mitigation-related concepts into the existing Growing Smart framework through:

- **Developing brochures using the Growing Smart logo to**

promote hazard mitigation in the business community.

- **Discouraging development in hazard areas such as steep slopes with landslide potential.**
- **Educating local governments about the benefits of adopting building standards to mitigate against wind and earthquake hazards.**

Additionally, the Department of Public Works takes into account hazard-prone areas when siting facilities and infrastructure such as water and sewer lines. The Public Works Department avoids such areas, thereby discouraging development while protecting services in the event of a disaster.

Twenty communities currently participate in the Community Rating System (CRS), part of the National Flood Insurance Program. Each **community** has prepared a flood mitigation plan and has received funding for flood mitigation projects **(see Appendix XX for details)**. **Additionally, the State is currently developing a strategy to assist other communities to participate in the CRS, having set a goal to provide technical support to five communities per year. The strategy includes providing additional funding to communities that have adopted FMA Plans, to upgrade these plans into all-hazard plans.**

RISK ASSESSMENT

§201.4(c)(2) of the Rule requires that States undertake a risk assessment that provides the factual basis for developing a mitigation strategy. This provision encourages States to produce a meaningful analysis of the hazards and vulnerabilities that affect them, enabling States to prioritize jurisdictions or geographic areas to receive funding and technical assistance for conducting more detailed local risk and vulnerability assessments.

The purpose of the updated risk assessment is to present the current statewide overview of potential losses to guide implementation of mitigation measures, to prioritize jurisdictions most at risk from natural disasters, and to integrate data provided in local risk assessments.

The updated risk assessment will also include the integration of new data, where available, such as National Flood Insurance Program maps or studies, HAZUS analyses, or reports from other Federal and State agencies. If the previously approved plan identified data deficiencies that would be addressed at a later time, then FEMA would expect the new information to be incorporated in the updated risk assessment. However, if the data deficiencies have not been resolved, they must be addressed in the updated plan, accompanied by an explanation of why they remain and an updated schedule to resolve the issue.

When the State plans were originally prepared, there were few local plans that met FEMA's planning requirements. Therefore, States had limited local information on which to base their plans. Since then, many local plans have been approved and adopted, providing States with the opportunity to better coordinate with local jurisdictions and ensure that local risk assessments complement the State risk assessment.

Additionally, section 201.4(d) requires the State plan be updated regularly to address changes in development and mitigation priorities. This is reflected in the guidance language under §201.4(c)(2)(ii) and §201.4(c)(2)(iii).

This section includes the following six subsections:

- Identifying Hazards
- Profiling Hazards
- Assessing Vulnerability by Jurisdiction
- Assessing Vulnerability of State Facilities
- Estimating Potential Losses by Jurisdiction
- Estimating Potential Losses of State Facilities

IDENTIFYING HAZARDS

Requirement §201.4(c)(2)(i):	[The State risk assessment shall include an] overview of the type … of all natural hazards that can affect the State … .
Explanation:	A State hazard mitigation plan will only be effective if it accounts for all sources of risk. The intent of this requirement is to insure that all hazards potentially affecting the State are identified. During the State's planning process (as evaluated in the Planning Process section of this document), it may be determined that some of these hazard types do not pose a significant enough threat to justify further study or the identification of corresponding mitigation actions. However, the mitigation plan *should* clearly document that a thorough and comprehensive identification of hazards was performed by the State, including the fact that certain hazards were deemed not to be significant enough to warrant further study, to receive a satisfactory score for this requirement. This section *should* include a description of how the State collected the information to identify these hazards, including the sources of information. This process *should* also include incorporating the results of local level mitigation planning efforts to identify hazards as that information becomes available.
Plan Update:	The updated plan **must** address any newly identified hazards or hazards that have been determined to pose a more significant threat than was apparent when the previously approved plan was prepared. If improved descriptions of hazards identified in the previous plan are available, they **must** be incorporated into this section.
Special Considerations:	Although the Rule requires that States only identify natural hazards, States may include manmade hazards (i.e., technological or accidental events such as hazardous material accidents and terrorism or intentional acts such as the release of chemical agents) to provide a more complete analysis of hazards that may affect the States. However, plans will not be penalized for not including this information.
Resources:	For more information on identifying hazards, see: ✓ *Understanding Your Risks* (FEMA 386-2), Step 1. ✓ *Integrating Manmade Hazards into Mitigation Planning* (FEMA 386-7), Phase 2. ✓ *HAZUS MH* https://www.fema.gov/hazus/

Examples:

Original Submittal:

The State Mitigation Plan addresses the risk associated with the following hazards:

- Drought
- Flooding
- Hurricanes

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(2)(i)		▪ The plan did not include wildfires that have occurred in the past. ▪ The State did not indicate how these hazards were identified. As a result, it cannot be determined if this is a valid list of all relevant hazards. ▪ The State did not indicate if hazards identified as part of mitigation planning by local jurisdictions are or will be included in this listing.

Required Revisions:

For a "Satisfactory" score, the plan must include wildfires. The State is experiencing a drought and has had wildfires in the past under such conditions. While not required by the Rule, the plan should also document the process followed to identify hazards and identify the extent to which hazards identified through local mitigation planning have been or will be included in the State plan.

N S

Revised Submittal:

The State **Hazard Mitigation Committee (HMC) pursued the following steps to identify hazards that may affect the state:**

- **Review of past State and Federal disaster designations.**
- **Review of current Flood Insurance Rate Maps (FIRMs).**
- **Review of available local mitigation plans (see Appendix XX for a complete listing of local mitigation plans, including DMA 2000, FMA, and CRS, consulted as part of this planning process).**
- **Review of recent risk assessment related research by State and Federal agencies, as well as the State University's (SU) Emergency Management Program within the Department of Planning. This research involves long-range weather trends per the U.S. Meteorological Service as a predictor of potential periods of drought or increased hurricane activity and the probability of dam failures within the State per the recent SU study (see Appendix XX for a complete listing of studies consulted as part of this planning process).**
- **The HMC representative from the State Geological Survey was consulted regarding the earthquake risk in the State. She indicated that the risk was minimal (.001%/year of a 4.0+ earthquake); therefore, the HMC decided not to study the earthquake hazard any further.**

As a result, the HMC determined that the State Mitigation Plan **needed to** address ~~addresses~~ the risk associated with the following hazards:

- Drought
- Flooding, **including related potential for dam failures**
- Hurricanes
- **Wildfires**

PROFILING HAZARDS

Requirement §201.4(c)(2)(i):

[The State risk assessment shall include an overview of the] location of all natural hazards that can affect the State, including information on previous occurrences of hazard events, as well as the probability of future hazard events, using maps where appropriate … .

Explanation:

The plan **shall** provide an overview of the **location** of all natural hazards that can affect the State. The plan *should* describe the geographic boundaries in the State that would be affected by these hazards.

Where appropriate, the hazard analysis *should* also broadly identify on a map the areas of the State affected by each hazard, noting those areas most severely affected by each hazard. A composite map (i.e., a map showing combined information from different thematic map layers) can be provided for hazards that have a recognizable geographic boundary (i.e., hazards that are known to occur in particular areas of the State), such as floods, coastal storms, wildfires, tsunamis, and landslides.

For those hazards that are not geographically determined, plans *should* indicate their probable intensity. For example, for areas where tornadoes occur, plans should indicate the recorded intensities of previous events.

The plan **shall** also provide a discussion of **past hazard events**. This discussion *should* include:

- Information on the damages that occurred (e.g., costs of recovery, property damage, and lives lost) to the extent practicable.
- Level of severity (i.e., flood depth or extent, wind speeds, earthquake intensity).
- Duration of event.
- Date of occurrence.
- Sources of information used or consulted for assembling a history of past occurrences.

The plan **shall** also include information on the **probability** of future hazard events. In addition, it *should* describe the analysis or sources used to determine the probability and their magnitudes.

The plan *should* also describe conditions (i.e., topography, soil characteristics, meteorological conditions, etc.) in the planning area that mitigate the hazard effects or make the area more vulnerable to hazards.

Plan Update:

The plan update **must** continue to include occurrences of hazards profiled in the previous plan, and discuss new occurrences of hazard events. The updated plan **must** incorporate any new studies or technical information related to profiling hazards, such as new National Flood Insurance Program maps or studies, HAZUS studies, or reports from other Federal or State agencies that relate to:

- Location of natural hazards;
- Past hazard events;
- Probability of future hazard events.

While maps are not required, any maps included in the updated plan **must** be consistent with the updated information.

Resource:

For more information on profiling hazards, see:

✓ *Understanding Your Risks* (FEMA 386-2), Step 2.

✓ *Integrating Manmade Hazards into Mitigation Planning* (FEMA 386-7), Phase 2.

✓ *HAZUS MH* http://www.fema.gov/plan/prevent/hazus/

Examples:

N/S

Original Submittal:

[For illustrative purposes, only the flood hazard is profiled in this example.]

Through analysis of existing Federal Flood Insurance Rate Maps (FIRMs) and Flood Insurance Studies (FISs), the Hazard Mitigation Committee (HMC) determined that every County in the State may be affected by the flooding hazard. A variety of factors affect the type and severity of flooding throughout the State, including topography, urban development and infrastructure, and proximity to the coastline.

The State has been affected by a number of floods over the past several years. Most notably, Hurricane Young in 1997 caused flooding that generated a Presidential Disaster Declaration for the Counties of Allwater, Bedlam, Calm-before-the-Storm, and Turmoil. The flood caused several million dollars in damages.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(2)(i)		▪ The plan did not include the location of the type of floods. ▪ The history of floods is only of recent years. ▪ The plan does not discuss probability. ▪ The State did not provide details about conditions, such as topography, that could make areas more or less vulnerable to each hazard. ▪ There is no indication of areas of the State that are more severely affected by each hazard. ▪ The State did not provide a map that identified the areas affected by each hazard.

Required Revisions:

For a "Satisfactory" score, the plan must describe the hazard areas, provide a more complete history of past events, and include the probability of future hazard events. While not required by the Rule, the plan should also document the process used to determine differences in vulnerability to the hazard; differentiate the ways in which areas of the State are affected; and provide a map or other tool to delineate hazard areas.

N S

Revised Submittal:

Flooding

Through analysis of existing Federal Flood Insurance Rate Maps (FIRMs) and Flood Insurance Studies (FISs), the Hazard Mitigation Committee (HMC) determined that every County in the State may be affected by ~~the~~ **riverine** flooding ~~hazard~~ **(see Flood Hazard Map in Appendix XX). The State regularly experiences 10-year floods and has on several instances suffered the devastating effects of 500-year floods. See Appendix XX for a history of floods and their related damages dating back to 1850. This history was assembled from the information provided in local hazard mitigation plans as well as the previous State Hazard Mitigation Plan.**

The probability of a flood event is expressed as the percent chance that a flood of a specific magnitude will occur in any given year. Table 1 summarizes the associated chance of occurrence for the type of floods the State has experienced.

Table 1: Flood Probability of Occurrence

Flood Return Intervals	Chance of Occurrence in Any Given Year
10-Year	10%
50-Year	2%
100-Year	1%
500-Year	0.2%

~~The State has been affected by a number of floods over the past several years. Most notably, Hurricane Young in 1997 caused flooding that generated a Presidential Disaster Declaration for the Counties of Allwater, Bedlam, Calm-before-the-Storm, and Turmoil. The flood caused several million dollars in damages.~~

A variety of factors affect the type and severity of flooding throughout the State, including topography, urban development and infrastructure, and proximity to the coastline.

Riverine Flooding
Mountain Region (Allwater, Bedlam, Calm-before-the-Storm, and Turmoil Counties)

Flooding in the Mountain Region is characterized by high-velocity waters flowing to the valleys. During heavy rains from storm systems, including severe thunderstorms and tropical storms, water flows down from the mountain, collecting in, then overtopping, valley streams and rivers. The steep slopes of the region induce high velocities as the water flows downhill and downstream, in many cases producing flash flooding conditions. Because some towns in the Mountain Region have the majority of the corporate limits located in the valley and, therefore, often in the floodplain, flood waters have the potential to affect or even severely harm whole towns. Because of the steep topography, developable areas of the town are within the 100-year floodplain, and some are affected by 10- and 50-year floods. These conditions, especially in areas where flash floods are a problem, make response operations and evacuation very difficult, adversely affecting the safety of the residents.

These flash flooding response and evacuation problems were illustrated in Bedlam County during the summer of 1999. The passage of Tropical Storm Zoe created flash flooding in the towns of Chaos and Pandemonium. While the floodwaters only reached an estimated 10-year flood elevation, the sudden onset of the flood and swift waters did not allow warning to the residents and, consequently, a driver attempting to drive through waters that had overtopped a secondary road was swept away by the waters.

Furthermore, about 10 homes in Chaos and 15 homes in Pandemonium were flooded, creating an estimated $100,000 in damages (see Appendix XX for a detailed history of floods in this area).

ASSESSING VULNERABILITY BY JURISDICTION

Requirement §201.4(c)(2)(ii):	[The State risk assessment shall include an] overview and analysis of the State's vulnerability to the hazards described in this paragraph (c)(2), based on estimates provided in local risk assessments … . The State shall describe vulnerability in terms of the jurisdictions most threatened by the identified hazards, and most vulnerable to damage and loss associated with hazard events … .
Update: ***§201.4(d):***	**Plan must be reviewed and revised to reflect changes in development…**

Explanation: The plan **shall** describe which jurisdictions are most threatened and vulnerable to hazards and the process used to identify them. Identification of these jurisdictions **shall** be based on an analysis of available local risk assessments conducted throughout the State, and where not available, on State risk assessments.

Plan Update: The State **shall** describe any changes, clarifications, or refinements to the previous overview of the State's vulnerability resulting from any new or updated data, as well as information generated through local mitigation plans.

The update **must** explain the process used to analyze information from the local risk assessments and adjust the statewide risk assessment, as necessary. Recognizing the differences in local risk assessments, information from local mitigation plans allows the State to better understand or describe its vulnerability in terms of the jurisdictions most threatened by natural hazards. However, the update should not attempt to include the details provided in every local mitigation plan.

Recognizing that statewide vulnerability may not change much in any given three-year update cycle, this section provides an opportunity to anticipate future risk. The State **must** consider in its assessment, for jurisdictions in hazard prone areas, changes in development that may impact vulnerability such as:

- Significant population increases and shifts in population to vulnerable areas;
- A concentration or changes in land use or land use activities in vulnerable areas; and/or
- Implementation of mitigation actions that have reduced vulnerability.

Taking into account that some previously approved local plans included a general overview of land uses and development trends, it is up to the State to describe jurisdictions most threatened and vulnerable to damage and losses associated with hazard event based on such factors as:

- The review and incorporation of development trends provided in local mitigation plans; and,
- Statewide population growth estimates, projections, and land use data.

The State determines the level of detail provided in the updated plan but it must demonstrate that land uses, development trends, and population were assessed to obtain a statewide picture of changes to vulnerability. This information can be presented generally or specifically, using text, graphics, maps, or a combination of these methods.

In most cases, changes in population and anticipated development trends are tracked by one or more State agencies as well as Regional or Metropolitan Planning Organizations. Expected development patterns may also be described in other State plans, such as Operation Plans and Land Development Plans, or in functional plans, like transportation and economic development plans. These agencies, organizations, and plan documents can provide valuable information to indicate where growth is likely to occur in the future.

Resource:

For an explanation on ways to determine what areas are the most vulnerable to damage and loss, see:

- ✓ *Understanding Your Risks* (FEMA 386-2), Steps 3 and 4.
- ✓ *Integrating Manmade Hazards into Mitigation Planning* (FEMA 386-7), Phase 2.
- ✓ *HAZUS MH* https://www.fema.gov/hazus/

Examples:

Original Submittal:

[For illustrative purposes, only the flood hazard vulnerability is included in this example.]

Flood Hazard Vulnerability

As development has increased in and along floodplains, urban and suburban areas of the State have been increasingly impacted by flash flooding and flooding along streams and rivers. Across the State, an estimated 1.5 million people live within areas designated as 100-year floodplains.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(2)(ii)		▪ The plan did not differentiate areas of the State that have greater vulnerability to flooding than others.

Required Revisions:

For a "Satisfactory" score, the plan must detail the factors determining vulnerability to the State. While not required by the Rule, the plan should provide information at the local/County level to the extent possible, allowing the State to contrast areas of higher and lower vulnerability.

Revised Submittal:

Flood Hazard Vulnerability

~~As development has increased in and along floodplains, urban and suburban areas of the State have been increasingly impacted by flash flooding and flooding along streams and rivers. Across the State, an estimated 1.5 million people live within areas designated as 100-year floodplains.~~

The State Department of the Environment used GIS technology to overlay aerial photographs with the 100-year floodplain. The Department determined that some Counties have a higher percentage of structures located within the 100-year floodplain, and therefore have a higher vulnerability to the flooding hazard than other Counties. In addition, using FIRMs, FISs, and topographic mapping, the Department identified areas where steep slopes could increase flood velocity. By reviewing the flood hazard assessments provided in local mitigation plans (including FMA and CRS plans), the HMC identified exacerbating circumstances that may lead to greater flood vulnerability, including stormwater management issues and a high percentage of impervious surfaces in or near the floodplain. A detailed analysis of the flood hazard and related map are provided for each County of the State in Appendix XX. The following table summarizes flood attributes by County.

Table XX: Flood Vulnerability by County

County	% of Structures in Floodplain	Steep Slopes/High Velocity Water	Stormwater Management Issues[1]	Impervious Surfaces[2]	Estimated No. of People Affected	Assessed Relative Vulnerability	No. of Critical Facilities Affected
Allwater	50%	●			12,000	H	4
Bedlam	4%	●			1,000	L	1
Calm-before-the-Storm	10%	●			3,000	M	3
Turmoil	1%		●	15%	2,000	M	1

[1]**Stormwater Management Issues** encompass assessments by local governments, such as debris in stormwater collectors, culvert sizes, etc. that lead to increased localized flooding during heavy rains.

[2]**Impervious Surfaces** describe the percentage of acres of paved surfaces in or near floodplains.

ASSESSING VULNERABILITY OF STATE FACILITIES

Requirement §201.4(c)(2)(ii):

[The State risk assessment shall include an overview and analysis of the State's vulnerability to the hazards described in this paragraph (c)(2), based on estimates provided in] the State risk assessment. … State owned critical or operated facilities located in the identified hazard areas shall also be addressed … .

Explanation:

The plan **shall** describe the State-owned or operated buildings, infrastructure, and critical facilities located in areas subject to hazards described previously. The description *should* include the uses, approximate sizes, types, and values of buildings, infrastructure, and critical facilities.

Plan Update:

The State **shall** update the overview and analysis of vulnerable State owned or operated buildings, critical facilities, and infrastructure, based on available data. The update *should* reflect acquisition or development of new properties and infrastructure.

Resource:

For an explanation on ways to determine what areas are at risk and vulnerable, see:

- ✓ *Understanding Your Risks* (FEMA 386-2), Steps 3 and 4.
- ✓ *Integrating Manmade Hazards into Mitigation Planning* (FEMA 386-7), Phase 2.
- ✓ *HAZUS MH* https://www.fema.gov/hazus/

Examples:

N/S

Original Submittal:

Vulnerable State Facilities

Using FIRMs, the Hazard Mitigation Committee (HMC) ascertained that three State facilities are located in the floodplain.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(2)(ii)		▪ The plan does not provide an analysis of the vulnerability of these facilities in the floodplain.

Required Revisions:

For a "Satisfactory" score, the plan must document the process by which the State developed its vulnerability assessment for State facilities and also provide enough detail of the findings to make the relative vulnerability of the structures evident. While not required by the Rule, the analysis should include an assessment of the facilities' first floor elevations in relation to the base flood elevation, an indication of the value of the buildings and contents, and a description of the buildings' functions and how the buildings' functions would be compromised if flooded.

N S

Revised Submittal:

~~Vulnerable~~ Vulnerability of State Facilities to Flooding

~~Using FIRMs, the Hazard Mitigation Committee (HMC) ascertained that three State facilities are located in the floodplain.~~

At the request of the Hazard Mitigation Committee (HMC), surveyors and engineers from the State Department of the Environment and the Department of Public Works conducted site assessments of all State facilities located within the 100-year floodplain to determine their vulnerability to flooding. First floor elevations, construction types, square footages, content types, and approximate value of the structures and contents were documented for each facility. The table below summarizes these findings, including the location, function, approximate value of the structure and its contents, and the number of feet above or below base flood elevation. Approximate values of structure and contents were estimated using the judgment of the facilities managers of the respective structures and following the guidelines detailed in the FEMA document, *Understanding Your Risks: Identifying Hazards and Estimating Losses,* Step 4. A detailed list of these findings can be found in Appendix XX.

Table XX: State Facilities in the 100-Year Floodplain

County	Function	No. of Affected State Employees	Approx. Value of Structure	Approx. Value of Contents	First Floor Elevation Above (+) or Below (-) BFE	Critical Facility
Allwater	Offices	250	$1M	$1M	+5	●
Bedlam	State Emergency Operations Center	50	$1M	$1.5M	+3	●
Calm-before-the-Storm	Warehouse/Garage for Snow Removal Equipment	15	$1M	$1.5M	-2	●

ESTIMATING POTENTIAL LOSSES BY JURISDICTION

Requirement §201.4(c)(2)(iii):	[The State risk assessment shall include an] overview and analysis of potential losses to identified vulnerable structures, based on estimates provided in local risk assessments … .
Update: §201.4(d):	Plan must be reviewed and revised to reflect changes in development…

Explanation:

This requires States to incorporate the findings of local jurisdiction loss estimates in the State plan. The plan **shall** describe the distribution of losses across the State and *should* include specific reference to quantifying losses to local critical facilities.

Plan Update:

The State **shall** incorporate any changes, clarifications, or refinements, obtained from State-wide or local loss estimates. Recognizing the differences in local risk assessments, information from local mitigation plans allows the State to better understand or describe its vulnerability in terms of the potential losses. However, the update should not attempt to include the details provided in every local mitigation plan.

Comparable to the estimating vulnerability by jurisdiction, the state **must** consider changes in development that may affect the statewide loss estimates.

Special Considerations:

Although the Rule requires that States only analyze losses to structures, States are highly encouraged to analyze the potential economic and human impact each hazard would have statewide.

Resource:

For more information on assessing vulnerability/estimating losses, see:

- ✓ *Understanding Your Risks* (FEMA 386-2), Step 4.
- ✓ *Integrating Manmade Hazards into Mitigation Planning* (FEMA 386-7), Phase 2.
- ✓ *HAZUS MH* https://www.fema.gov/hazus/. FEMA has developed the HAZUS-MH Risk Assessment Tool (RAT) to help produce risk assessment outputs for earthquakes, floods, and hurricanes. The summaries can support the presentation of data to decision-makers and other stakeholders and can be used in the risk assessment section of the mitigation plan.

Examples:

N/S

Original Submittal:

[*For illustrative purposes, only the flood hazard is discussed*.]

Flood Vulnerability

Across the State, an estimated 150,000 people and 40,000 structures are located within the boundaries of the 100-year floodplain, putting at risk the State's revenue of $1 billion.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(2)(iii)		▪ The plan does not describe the State's potential losses. ▪ The plan does not explain how the State developed the loss figures.

Required Revisions:

To receive a "Satisfactory" score, the plan must provide an overview and analysis of losses to local jurisdictions. While not required by the Rule, the plan should also document how it developed its loss estimations and include information to assess relative losses across the State.

N S

Revised Submittal:

~~Flood Vulnerability~~ Potential Flood Losses by Jurisdiction

Across the State, an estimated 150,000 people and 40,000 structures are located within the boundaries of the 100-year floodplain, putting at risk the State's revenue of $1 billion.

The table below represents the estimated losses to residential, commercial, and critical facilities and buildings by County. The estimates were taken from local hazard mitigation plans and are added to provide an estimated total State loss for each category. Except for Allwater County, which has not updated its plan, each county determined losses using the procedures explained in the FEMA document, *Understanding Your Risks: Identifying Hazards and Estimating Losses*. The process used by the Hazard Mitigation Committee (HMC) for determining Allwater County's potential losses is explained in the table's footnote.

County	Estimated Residential Losses (in Millions)	Estimated Commercial Losses (in Millions)	Estimated Losses to Critical Facilities (in Millions)	Relative Losses (in Millions)
Allwater*	$75.0	$2.4	$2.0	H
Bedlam	$ 0.3	$0.1	$0.1	L
Calm-before-the-Storm	$ 6.5	$ 3.0	$1.0	H
Turmoil	$2.2	$1.5	$0.5	M
Total Losses to State	$84.0	$ 7.0	$3.6	94.6

* Because Allwater County has not yet submitted a plan that estimates losses to residential, commercial, and critical facilities, all figures for this County were estimated by multiplying the percentage of structures in the floodplain (50% of all structures) with County economic data included in State demographic and tax information.

Estimated Residential Losses = 50% x No. of residences x median housing value.

Estimated Commercial Losses = 50% x No. of businesses x median building value x median business revenue.

Estimated Critical Facilities = 50% x No. of police and fire stations, hospitals, schools x median estimated losses to critical facilities of all other counties.

This method is not an accurate measure of vulnerability because depth of flooding for each structure in the floodplain was not assessed.

ESTIMATING POTENTIAL LOSSES OF STATE FACILITIES

Requirement §201.4(c)(2)(iii):

[The State risk assessment shall include an overview and analysis of potential losses to identified vulnerable structures, based on estimates provided in] the State risk assessment. The State shall estimate the potential dollar losses to State-owned or operated buildings, infrastructure, and critical facilities located in the identified hazard areas.

Explanation:

This requires States to estimate losses to State-owned or operated facilities and infrastructure. The plan **shall** describe the distribution of losses across the State, with specific reference to quantifying losses to critical facilities.

States *should* also describe their approach for determining losses for State-owned infrastructure and buildings.

Plan Update:

If there are changes to the hazard profile and/or to the State facilities and infrastructure as described under Assessing Vulnerability of State Facilities, this section **must** be updated to reflect potential losses to identified vulnerable structures and infrastructure. If the approach for determining these losses has changed since the first approval, the plan *should* describe the new methodology.

Resource:

For more information on assessing vulnerability/estimating losses, see:

- ✓ *Understanding Your Risks* (FEMA 386-2), Step 4.
- ✓ *Integrating Manmade Hazards into Mitigation Planning (FEMA 386-7),* Phase 2.
- ✓ *HAZUS MH* https://www.fema.gov/hazus/. FEMA has developed the HAZUS-MH Risk Assessment Tool (RAT) to help produce risk assessment outputs for earthquakes, floods, and hurricanes. The summaries can support the presentation of data to decision-makers and other stakeholders and can be used in the risk assessment section of the mitigation plan.

Examples:

N/S

Original Submittal:

Vulnerability of State Facilities to Flood

Using FIRMs, the Hazard Mitigation Committee (HMC) ascertained that three State facilities are located in the floodplain.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(2)(iii)		▪ The plan does not discuss the actual vulnerability and potential losses to the facilities in the floodplains.

Required Revisions:

The plan must make clear the potential losses to State facilities and infrastructure. These losses should be estimated as a function of the vulnerability to the hazard (here, flood depth), with potential losses calculated based on the estimated value of the structure.

Revised Submittal:

~~Vulnerability of State Facilities to Flood~~ **Potential Flood Losses to State Facilities**

~~Using FIRMs, the (Hazard Mitigation Committee) (HMC) ascertained that three State facilities are located in the floodplain.~~

Using the procedure detailed in the FEMA document, *Understanding Your Risks*, to determine the estimated percentage loss to structure and contents, the HMC determined that the warehouse/garage housing snow removal supplies and equipment was the only critical facility in the floodplain that would suffer damages in a 100-year flood event. The facility would suffer approximately $422,500 in losses to the structure and its contents.

Location of State Facility	Function	No. of Critical Facility	Approx. Value of Structure	Approx. Value of Contents	First Floor Elevation Above (+) or Below (-) BFE*	Estimated % Loss to Structure	Estimated % Loss to Contents	Estimated Structure Losses	Estimated Content Losses	Relative Losses
Allwater	Offices		$1M	$1M	+5	0%	0%	$0	$0	L
Bedlam	State Emergency Operations Ctr.	1	$1M	$1M	+3	0%	0%	$0	$0	L
Calm-before-the-Storm	Warehouse/ Garage for Snow Removal Equip-ment	1	$1M	$1.5 M	-2	13%	19.5%	$130K	$292.5K	H
Total Losses to State Critical Facilities								$130K	$292.5K	

*BFE: Based Flood Elevation

MITIGATION STRATEGY

According to §201.4(c)(3) the plan must include a mitigation strategy that provides the State's blueprint for reducing the losses identified in the risk assessment. The strategy shall include goals that are based on the risk assessment and that should be consistent with goals from other State and local jurisdictions' plans and policies. While not required by the Rule, objectives could also be included to define strategies or steps to achieve the identified goals. These goals and objectives will guide the State's strategies and selection of actions to achieve the desired, long-term hazard protection. The State must also assess its own as well as its local jurisdictions' capabilities to staff programs or projects and fund actions to achieve the goals of the plan. The State must also identify funding from Federal, local, and private sources to complement its own resources.

Section 201.4(d) requires that plans be reviewed and revised to reflect progress in statewide mitigation efforts and changes in priorities. This is reflected in the guidance language under §201.4(c)(3)(i) and §201.4(c)(3)(iii). Fundamental to the mitigation strategy update is the demonstration that progress has been made to implement the mitigation strategy identified in the previously approved plan. The updated mitigation strategy provides an opportunity for the State to discuss efforts to ensure consistency between the goals and objectives of the State plan, and those of the local plans that have been approved.

This section includes the following five subsections:

- Hazard Mitigation Goals
- State Capability Assessment
- Local Capability Assessment
- Mitigation Actions
- Funding Sources

HAZARD MITIGATION GOALS

Requirement §201.4(c)(3)(i):	[The State mitigation strategy shall include a] description of State goals to guide the selection of activities to mitigate and reduce potential losses.
Update: §201.4(d):	**[The] plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts and changes in priorities…**

Explanation:

The State's goals as written in the plan reflect the State's vision for long-term hazard mitigation and loss reduction. This section *should* describe how the plan's goals were developed.

These goals, along with their corresponding objectives, guide the development and implementation of mitigation actions. Although the Rule does not require a description of objectives, States are highly encouraged to include a description of the objectives developed to achieve the goals so that reviewers understand the connection between goals, objectives, and actions.

The goals and objectives *should*:

- Be based on the findings of the local and State risk assessments.
- Represent a long-term vision for hazard reduction or enhancement of mitigation capabilities.

Plan Update:

The plan update provides an opportunity for the State to reconsider the goals and objectives adopted in the previously approved plan to guide the selection of activities to mitigate and reduce potential losses. Goals may be reaffirmed or updated based on more current information, including updated or new risk assessments or changes in State mitigation priorities. It is not necessary to change previous goals if they remain valid but the plan **must** demonstrate that State goals were assessed and that they still remain valid.

If the previously approved plan included objectives, the updated plan *should* point out which objectives have been met and identify new objectives.

Resources:

For more information on identifying and refining the State's mitigation goals and objectives, see:

✓ *Developing the Mitigation Plan (FEMA 386-3)*, Step 1.

Special Considerations:

Goals are general guidelines that explain what you want to achieve. They are usually long-term and represent global visions such as "eliminate flood damage."

Objectives define strategies or implementation steps to attain the identified goals. Unlike goals, objectives are specific, measurable, and may have a defined completion date. Objectives are more specific, such as "upgrade State building code to meet the provisions of the National Earthquake Hazards Reduction Program."

(From *Developing the Mitigation Plan (FEMA 386-3)*, Step 1.)

Examples:

N S

Original Submittal:

The Hazard Mitigation Committee (HMC) identified the following goals for the plan:

Goal 1: Document the hazards and vulnerabilities in the State.

Goal 2: Identify priority mitigation projects to fund.

Goal 3: Raise awareness of hazards and mitigation actions in the State.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(3)(i)		▪ Goals 1 and 2 are what is to be accomplished by the planning process. ▪ No explanation is provided for how the goals were developed.

Required Revisions:

To receive a "Satisfactory" score, the plan must tie the goals to the risk assessment findings.

N S

Revised Submittal:

~~The Hazard Mitigation Committee (HMC) identified the following goals for the plan:~~

~~Goal 1: Document the hazards and vulnerabilities in the State.~~

~~Goal 2: Identify priority mitigation projects to fund.~~

~~Goal 3: Raise awareness of hazards and mitigation actions in the State.~~

The Hazard Mitigation Committee (HMC) participated in a 2-day workshop to review the risk assessment findings and develop the mitigation goals and objectives for the Hazard Mitigation Plan. The

risk assessment identified the following problems:

- **Local communities in the State were unaware of the types of assistance available to them for hazard mitigation planning.**
- **The State Division of Emergency Management often did not coordinate with local communities or other State agencies in hazard mitigation planning.**
- **Many State residents did not realize hazard mitigation planning was occurring in their area.**
- **The State would benefit from incorporating GIS and other technical information into their hazard mitigation planning process.**
- **The State has one of the highest numbers of repetitive loss properties in the country.**

At the end of this session, the HMC identified the following goals, objectives, and actions for the State of Emergency's mitigation strategy to address these issues.

Goal 1: Strengthen the Division of Emergency Management's capability and its coordination with other State agencies to reduce hazard vulnerabilities throughout the State.

Goal 2: Increase technical assistance to and coordination with local jurisdictions to build local capacity to further reduce vulnerabilities at the local level.

Goal 3: Build public awareness of proven, cost-effective mitigation actions.

Goal 4: Formulate strategies using state-of-the-art knowledge to reduce vulnerabilities for identified hazards.

Goal 5: Reduce the number of repetitive loss structures by 50%.

(For the purposes of this example, the following description applies to all hazards. For illustrative purposes, only one goal will be described in more detail.)

Goal 2: Increase technical assistance to and coordination with local jurisdictions to build local capacity to further reduce vulnerabilities at the local level.

Objectives 2.1: The State will work with local communities to improve their hazard mitigation planning process.

Short Term Action 2.2.1:

Note: "short term" is defined as those actions which agencies are capable of implementing within their existing resources and authorities in the current fiscal cycle.

Improve hazard mitigation technical assistance for local governments.

Lead Agency: State Office of Emergency Management

Support Agency: State Department of the Environment

Timeline: 1 year

Resources: 1 Full Time Employee

Long Term Action 2.2.2:

Note: "long term" is defined as those actions which will require new or additional resources or authorities to implement, and those actions which cannot occur during the current fiscal cycle.

The State will develop and distribute local hazard mitigation planning guidance.

Lead Agency: State Office of Planning

Support Agency: State Office of Emergency Management

Timeline: 3 years

Resources: 2 Full Time Employees

STATE CAPABILITY ASSESSMENT

Requirement §201.4(c)(3)(ii):

[The State mitigation strategy shall include a] discussion of the State's pre-and post-disaster hazard management policies, programs, and capabilities to mitigate the hazards in the area, including:

- an evaluation of State laws, regulations, policies, and programs related to hazard mitigation as well as to development in hazard-prone areas [and]
- a discussion of State funding capabilities for hazard mitigation projects … .

Explanation:

The State **shall** include a discussion of its financial, legal, and programmatic ability to carry out mitigation actions in the pre-and post-disaster setting to achieve its mitigation objectives and, ultimately, its goals. The mitigation strategy *should* not only address the ways the State's existing capabilities can aid the mitigation effort, but also address areas in which the State needs to strengthen its capabilities. Without an assessment of the State's capability, implementation of the plan could stall from inadequate resources.

The State **shall** conduct an evaluation of State laws, regulations, policies, and programs related to hazard mitigation as well as to development in hazard-prone areas. The State *should* discuss existing and emerging State policies and programs for both pre- and post-disaster mitigation. The discussions *should* include: implementation opportunities and problems (e.g., financial/staffing resources, lack of informed public, non-mandated improvements, etc.), opportunities for improving State capabilities, conflicts created by public investment policies (e.g., policies that have promoted public investment in hazard-prone areas), and problems created by private development projects in hazard-prone areas. The State *should* highlight implementation tools, policies, and programs that have proven to be effective in achieving mitigation objectives (e.g., planning legislation requiring integration of mitigation actions in comprehensive plans). The State *should* also identify those laws, regulations, and policies that can be amended to integrate mitigation actions or to remove provisions that hinder mitigation efforts.

The State **shall** describe its assessment of its funding capabilities for hazard mitigation projects. The discussion *should* include positive aspects, as well as problems encountered, and identify areas where the State needs to seek outside funding sources.

Plan Update:

The plan update provides an opportunity for the State to re-evaluate its pre- and post-disaster hazard management policies, programs, and capabilities. The plan update **must** address any hazard management capabilities of the State that have changed since approval of the previous plan.

The State **shall** also provide an updated assessment of its funding capabilities for hazard mitigation projects.

In the previously approved plan, the State may have identified laws, regulations and policies that could be amended to integrate mitigation actions or to remove provisions that hinder mitigation efforts. Where applicable, the updated plan *should* describe progress in modifying these policies and legislation or identify where opportunities for integration still remain.

Resource: For tips for assessing mitigation capabilities, see:

- ✓ *Developing the Mitigation Plan* (FEMA 386-3), Step 2.

Examples:

Original Submittal:

The State Mitigation Plan has identified those pre- and post-disaster State regulations, policies, and programs related to hazard mitigation.

For example, a major hazard the State faces is flooding. The State has taken steps to become more proactive in its approach to flood hazard mitigation planning. The Emergency Management Agency has instituted the Comprehensive Flood Management Grant Program and Repetitive Loss Project, while the State Department of the Environment has instituted the Technical Assistance Program. These programs are geared towards providing mitigation planning assistance to communities in the State.

The State has many funding programs in place which are available to municipalities that need assistance. These funds are primarily from various Federal grant programs.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(3)(ii)		▪ The plan does not evaluate the laws, regulations, policies, and programs. ▪ The discussion on funding is too general and incomplete to address the requirement. ▪ The plan did not indicate how State programs were identified or how they were beneficial. ▪ There are no regulatory reviews or regulations indicated that might be improved for mitigation purposes. ▪ The plan does not discuss programs or policies the State can use to improve capabilities.

Required Revisions:

To receive a "Satisfactory" score, the plan must evaluate the State's capability to reduce losses and discuss in more detail the State's funding resources. While not required by the Rule, the plan should include what effort was made to identify programs and policies under consideration, including executive orders or new legislation needed to implement the plan recommendations.

N S

Revised Submittal:

The State Mitigation Plan has identified those pre- and post-disaster State regulations, policies, and programs related to hazard mitigation. **As a result of this, the State Hazard Mitigation Committee (HMC) held several meetings with various State Agencies. Those programs selected as most beneficial are described as follows.**

~~For example, a major hazard the State faces is flooding. The State has taken steps to become more proactive in its approach to flood hazard mitigation planning. The Emergency Management Agency has instituted the Comprehensive Flood Management Grant Program and Repetitive Loss Project, while our State Department of the Environment has instituted the Technical Assistance Program. These programs are geared towards providing mitigation planning assistance to communities in the State.~~

The State Emergency Management Agency identified the Comprehensive Flood Management Grant Program and Repetitive Loss Projects as the most beneficial programs. The Comprehensive Flood Management Grant Program has allowed the State to assist communities in all aspects of floodplain management, including the development of local floodplain plans, the provision of funding for various flood control and watershed studies, and the acquisition of flood-prone properties. The Repetitive Loss Project uses GIS software to map repetitive loss structures and areas in an effort to determine which types of mitigation actions are most appropriate.

The State Department of the Environment indicated that the Technical Assistance Program has been very beneficial. The Technical Assistance Program provides help to communities on a variety of topics and acts as a clearinghouse for information on mitigation planning, including such things as providing guidance on the planning process and funding sources available to communities.

The State has many funding programs in place which are available to municipalities that need assistance. These funds are primarily from various Federal grant programs. **Currently, the State uses HMGP, FMA, and Community Development Block Grants (CDBG) funds to promote mitigation activities. The State supplements these sources with funding from its State Office for Mitigation Funding and partnerships with the private sector (see Table XX for a list of projects funded by these programs).**

The State Legislature recently passed the State Resource Protection and Hazard Mitigation Planning Act. This act gives the State the authority to make certain that State government activities are consistent with the policies of the State Mitigation Plan. Although this is a new act and agencies are just beginning to implement it, it is expected to have a significant positive impact on hazard mitigation planning within the State (see Section XX, Goals, for more details on the expected results of this act).

LOCAL CAPABILITY ASSESSMENT

Requirement §201.4(c)(3)(ii):	[The State mitigation strategy shall include] a general description and analysis of the effectiveness of local mitigation policies, programs, and capabilities.

Explanation: The plan **shall** include a general description of local mitigation policies, programs, and capabilities. The State **shall** also describe how local pre- and post-disaster mitigation policies, programs, and capabilities, such as building codes, zoning, or land use policies, were evaluated to determine their effectiveness. This *should* include existing and emerging capabilities. The description can be kept general and does not need to be detailed for all localities.

The State *should* include in its description the following: implementation opportunities and problems (e.g., financial /staffing resources, lack of informed public, non-mandated improvements, etc.), opportunities for building local capabilities, and problems created by public investment policies (e.g., policies that may have inadvertently promoted public investments in hazard-prone areas). The State *should* highlight local implementation tools, policies, and programs that have proven to be effective in achieving mitigation objectives (e.g., adoption of planning legislation requiring integration of mitigation actions in comprehensive plans).

Plan Update: The updated plan **shall** include an updated general description and analysis of the effectiveness of current local mitigation policies, programs, and capabilities.

Resource: For tips on how to assess mitigation capabilities, see:

- ✓ *Developing the Mitigation Plan* (FEMA 386-3), Step 2.

Examples:

N/S

Original Submittal:

The State has a history of being a strong property rights State. Therefore, local governments have taken a longer time implementing some hazard mitigation actions. The State, however, has provided guidance to the local communities.

The mitigation actions most local governments already have in place are zoning regulations and building codes. Many local governments are currently working on adopting the most recent International Building Code (IBC) and rewriting their zoning regulations so they have more “teeth” to them to allow enforcement of the regulations.

New approaches that local governments are working on, with help from the State, are restrictive zoning, capital improvements planning, land use planning, and subdivision regulations. It is believed that local hazard mitigation will be more effective once these actions are implemented.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(3)(ii)		▪ The State did not identify why the policies mentioned are believed to be beneficial to hazard mitigation. ▪ The State did not mention how they are helping the local communities to adopt the recommended policies.

Required Revisions:

To receive a "Satisfactory" score, the plan must include what effort was made to assess the effectiveness of programs and policies under consideration.

N S

Revised Submittal:

The State Hazard Mitigation Committee (HMC) has been actively working with its local governments to identify those actions most effective for hazard mitigation planning. The State has a history of being a strong property rights State. ~~Therefore, local governments have had a longer time implementing the hazard mitigation actions.~~ **but support is growing for policies that will help with hazard mitigation. Through working with local governments, the HMC has identified policies currently in place and their effectiveness with hazard mitigation. The HMC has also identified policies that local communities are interested in adopting and how they can benefit mitigation.** ~~The State, however, has provided guidance to the local communities.~~ **The State does provide guidance to the communities by providing model ordinances and example plans, and even has funds available to communities interested in adopting hazard mitigation actions.**

~~The mitigation actions most local governments already have in place are zoning regulations and building codes. Many local governments are currently working on adopting the most recent International Building Code (IBC) and rewriting their zoning regulations so they have more "teeth" to them to allow enforcement of the regulations.~~

~~New approaches that local governments are working on, with help from the State, are restrictive zoning, capital improvements planning, land use planning, and subdivision regulations.~~

The existing and planned future policies of local governments are indicated in the following table. ~~It is believed that local hazard mitigation will be more effective once these actions are implemented.~~ **It is expected that their implementation will make local mitigation more effective.**

Existing Local Policies			
Policy	***Description***	***Applicability***	***Effectiveness***
Building Codes	The State has adopted a building code and local governments are required to adopt and enforce this code.	The adoption and enforcement of building codes relates the design and construction of structures to standards established for withstanding high winds and flooding.	All structures built after 1999 comply with the new building code, which includes special provisions for building in the floodplain.
Zoning	Laws and ordinances regulate development by dividing the community into zones and by setting development criteria for each zone.	Zoning can keep inappropriate development out of hazard-prone areas and can designate certain areas for such things as conservation, public use, or agriculture. Zoning can also be used to control construction by dedicating areas for cluster development or planned unit development. The State is currently working with local governments on implementing these last two policies.	Eight out of 12 counties have passed open space ordinances that have preserved over 20% percent of hazard-prone and environmentally sensitive areas (wetlands, aquifer recharge zones, and hillsides) in the State. These ordinances are based on local land use plans.
Future Planned Local Policies			
Policy	***Description***	***Applicability***	***Effectiveness***
Land Use Planning	Comprehensive land use planning provides a mechanism to prevent development in hazardous areas or allows development in a manner that minimizes damage from hazards. Land use planning gives local governments “the big picture” of what is happening in their jurisdiction.	Local governments can use land use planning to identify those areas subject to damage from hazards and work to keep inappropriate development out of these areas. Land use planning can also be used for a more regional approach when local governments work together.	Under the new local planning legislation, new development can be minimized in identified hazard areas.
Subdivision Regulations	Sets construction and location standards for subdivision layout and infrastructure.	Contains standards for such things as stormwater management and erosion control.	New subdivisions in flood hazard areas will be required to cluster homes outside of the floodplain, and will be given more flexibility in using varied densities within the subdivision.
Capital Improvements Planning	Identifies where major public expenditures will be made over the next 5 to 10 years.	Capital Improvement Plans can secure hazard-prone areas for low risk uses, identify roads or utilities that need strengthening, replacement, or realignment, and can prescribe standards for the design and construction of new facilities.	Realigned utilities in highest earthquake risk area.

MITIGATION ACTIONS

Requirement §201.4(c)(3)(iii):	[The State plans shall include an] identification, evaluation, and prioritization of cost-effective, environmentally sound, and technically feasible mitigation actions and activities the State is considering and an explanation of how each activity contributes to the overall mitigation strategy. This section should be linked to local plans, where specific local actions and projects are identified.
Update: §201.4(d):	**[The] plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts and changes in priorities….**

Explanation:

Based on the risk assessment portion of the plan, the State **shall** include in its statewide mitigation strategy actions it has identified through its planning process as well as those actions identified in Local Plans. The State *should* describe what agencies and interested parties were involved in identifying priorities, how actions were evaluated, and how such actions correspond to the plan's mitigation goals and objectives. Mitigation actions *should* be directly tied to goals and objectives and provide the means to achieve them. Actions can be:

- Statewide or property specific.
- Regulatory or programmatic.
- Targeted at government agencies or private industry.
- Construction activities or public outreach.

Plan Update:

The updated plan **must** identify the completed, deleted, or deferred actions or activities from the previously approved plan as a benchmark for progress. Further, the updated plan **shall** include in its evaluation and prioritization any new mitigation actions identified since the previous plan was approved or through the plan update process.

If the mitigation actions or activities remain unchanged from the previously approved plan, the updated plan **must** indicate why changes are not necessary.

The system identified under §201.4 (c)(5)(ii) and (iii), plan maintenance, will be useful in demonstrating progress in statewide mitigation efforts.

Resources:

For more information on evaluating mitigation actions, see:

- ✓ *Developing the Mitigation Plan* (FEMA 386-3), Step 2.
- ✓ *Integrating Manmade Hazards into Mitigation Planning* (FEMA 386-7), Phase 3.

Examples:

Original Submittal:

The State has compiled a list of mitigation projects, listed here by jurisdiction.

Mitigation Projects					
Statewide or County Specific	**Project Description**	**Hazard**	**Lead/Support Agency**	**Budget**	**Funding Source**
State Repetitive Loss Reduction Program	Comprehensive loss reduction program involving acquisition, elevation, relocation, and floodproofing of structures	Flooding	State Dept. of Emergency/ State Dept. of Public Works/Local Planning Agencies	$50 Million	PDM/ HMGP
Allwater County	Increase culvert size and retrofit bridge along State Highway 101	Flooding	Allwater Dept. of Highway and Safety/ State Dept. of Emergency	$6 Million	PDM (multiple grant application cycles)
Bedlam County	Conduct site visits to determine appropriate best practices for mitigating flooding of flood- prone historic structures	Flooding	Bedlam Dept. of Historic Preservation/ Bedlam Dept. of Env.	$35,000	Heritage Fund, Association for Historic Preservation, Bedlam Historic Society
State Coastal Zone Management Program	Review existing plans to determine effectiveness/ success of coastal erosion policies	Coastal Erosion	State Dept. of Env./State Dept. of Emergency	$150,000	Existing budget
State Earth-quake Hazard Reduction Program	Update the State Building code to the recommended provisions of the National Earthquake Hazards Reduction Program and promote local adoption	Earth-quakes	State Dept. of Planning/ State Dept. of Emergency/ Local Planning Depts.	$100,000	Existing Budget

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(3)(iii)		▪ The plan does not describe how these projects were evaluated and selected. ▪ There is no indication as to the priority for implementing these projects.

Required Revisions:

To receive a "Satisfactory" score, the plan must describe the approach used to evaluate and prioritize mitigation actions.

N S

Revised Submittal:

~~The State has compiled a list of mitigation projects, listed here by jurisdiction.~~ **The Hazard Mitigation Committee (HMC) hired a consultant to assist the HMC to evaluate potential projects and prepare a capital improvement plan for mitigation actions to be carried out over the next 10 years. The consultant met with the HMC to review projects identified in local plans and by the HMC. The consultant gathered relevant structure information (e.g., replacement value, square footage, percent of damage to structure likely, etc.) and relevant hazard information (e.g., probability of occurrence, magnitude of the event at the project site, etc.) and then analyzed the costs and benefits for each project to generate a cost-benefit estimate. The summary of results is included in the plan as Appendix XX. Each project was then judged against these three criteria: cost-benefit ratios greater than 1 (all projects receiving a cost-benefit ratio less than 1 were not considered for Federal funding), social benefits (or least negative impacts) to the communities, and environmental benefits (or least negative impacts) to the communities. The table below summarizes the HMC's findings. In cases where the probabilities, costs, or benefits were difficult to calculate due to lack of data, the HMC considered the amount of damage from past occurrences or the geographical extent of the hazard area, to assign a rank.**

Projects that had additional considerations, such as historic, environmental, or social value, while not meeting the economic criteria, have been included and indicated in the Capital Improvement Plan (CIP) with an asterisk. Funding for such projects will be pursued from private sources and State and local funds allocated whenever possible.

The State is focusing its mitigation efforts on reducing flood-related losses as a result of flooding hazards causing the highest losses of all the natural hazards in the state. One of its innovative programs is the comprehensive Repetitive Loss Reduction Program. The goal of this program is to reduce repetitive loss

properties by 50% within 10 years. The state has the highest number of repetitive loss properties in the country. While the focus of mitigation efforts is flooding, the State will continue to support other hazard mitigation activities such as those under the Earthquake Hazard Reduction Program.

Mitigation Projects									
Statewide or County Specific	**Project Description**	**Hazard**	**Lead/Support Agency**	**Budget**	**Funding Source**	**BC Review**	**Negative Social Impact**	**Negative Environ-mental Impact**	**Rank**
State Repetitive Loss Reduction Program	Comprehensive loss reduction program involving acquisition, elevation, relocation, and floodproofing of structures	Flooding	State Dept. of Emergency/ State Dept. of Public Works/Local Planning Agencies	$50 Million	PDM/ HMGP	**+**	**L**	**L**	**H**
Allwater County	Increase culvert size and retrofit bridge along State Highway 101	Flooding	Allwater Dept. of Highway and Safety/ State Dept. of Emergency	$6 Million	PDM (multiple grant application cycles)	**+**	**L**	**M**	**H**
Bedlam County	Conduct site visits to determine appropriate best practices for mitigating flooding of flood-prone historic structures	Flooding	Bedlam Dept. of Historic Preservation/ Bedlam Dept. of Env.	$35,000	Heritage Fund, Association for Historic Preservation, Bedlam Historic Society	**N/A**	**L**	**L**	**M**
State Coastal Zone Manage-ment Pro-gram	Review existing plans to determine effectiveness/ success of coastal erosion policies	Coastal Erosion	State Dept. of Env./State Dept. of Emergency	$150,000	Existing budget	**N/A**	**L**	**L**	**M**
State Earth-quake Hazard Reduction Pro-gram	Update the State Building code to the recommended provisions of the National Earthquake Hazards Reduction Program and promote local adoption	Earth-quakes	State Dept. of Planning/ State Dept. of Emergency/ Local Planning Depts.	$100,000	Existing Budget	**N/A**	**L**	**L**	**L**

FUNDING SOURCES

Requirement §201.4(c)(3)(iv):

[The State mitigation strategy shall include an] identification of current and potential sources of Federal, State, local, or private funding to implement mitigation activities.

Explanation:

The plan **shall** describe the current funding sources as well as potential sources that will be pursued to fund proposed mitigation projects and actions. It *should* also identify where funding is required to implement a project/activity identified in the mitigation strategy. Funding alternatives **shall** include Federal, State, local, and private sources.

The description can also include novel or alternative ways to fund actions, such as:

- Combining funding from various programs to implement a mitigation project.
- Integrating mitigation actions in implementing agencies' work plans.
- Identifying mitigation opportunities that may arise during scheduled infrastructure improvements, maintenance, or replacement, or other capital improvements.
- Building partnerships with businesses and non-profits whose properties, employees, or clients may be affected by hazards.
- Combining funding from various Federal programs to fund a comprehensive plan with a mitigation component.

Plan Update:

The updated plan **must** describe current and potential sources of funding to implement mitigation activities. The updated plan *should* associate current and potential funding with identified mitigation actions in the mitigation strategy, not just a general statement of funding.

The updated plan **must** identify the sources of mitigation funding used since approval of the previous plan to implement activities in the mitigation strategy.

Resource:

For more information on funding mitigation actions, see:

- ✓ *Developing the Mitigation Plan* (FEMA 386-3), Step 3.
- ✓ *Bringing the Plan to Life* (FEMA 386-4), Step 2.

Examples:

Original Submittal:

The State currently uses several funding sources to implement its hazard mitigation actions. Funding sources include: FEMA's Hazard Mitigation Grant Program (HMGP), Flood Mitigation Assistance (FMA), HUD's Community Development Block Grant (CDBG) via the State's Economic and Community Development Administration, and Small Business Administration (SBA) loans. These funds are used to implement a broad range of hazard mitigation actions. The State is also planning to pursue additional funding sources.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(3)(iv)		▪ The plan did not provide details about the funding sources and how they are used, including current funding levels, eligible types of actions, and current/past projects. ▪ The plan did not mention which future funding sources will be pursued. ▪ The plan did not mention State, local, or private funding sources.

Required Revisions:

To receive a "Satisfactory" score, the plan must include a description of State and private sector partnerships in place or describe the strategy for pursuing the private sector to take a more active role in implementing mitigation actions.

Revised Submittal:

The State currently uses several funding sources to implement its hazard mitigation actions. ~~Funding sources include: FEMA's Hazard Mitigation Grant Program (HMGP), Flood Mitigation Assistance (FMA), HUD's Community Development Block Grant (CDBG) via the State's Economic and Community Development Administration, and Small Business Administration (SBA) loans. These funds are used to implement a broad range of hazard mitigation actions. The State is also going to pursue additional funding sources.~~ **These funds primarily come from Federal and State sources, and the State is interested in pursuing additional private sources. These sources are listed in the following table.**

Funding Source	Description	Estimated Annual Funding
HMGP *Hazard Mitigation Grant Program*	Provides post-disaster funds to communities to help implement long-term hazard mitigation strategies.	$15M (from three past Presidential disaster declarations)
FMA *Flood Mitigation Assistance Program*	Provides pre-disaster funds. There are three types of grants: planning grants, project grants, and technical assistance grants. Requires a 25% non-Federal match and is based on the total number of NFIP policies in the State.	$500,000
CDBG *Community Development Block Grant*	Although this funding comes from HUD, it is made available to communities through the State Economic and Community Development Administration. The grants are used to expand affordable housing and economic opportunities, and to revitalize communities by improving community facilities and services.	$2M
SBA *Small Business Administration*	Post-disaster low interest, long-term loans given to homeowners, renters, businesses, or private non-profit organizations. Up to 20% of the loan amount can be used for hazard mitigation actions.	$500,000 (based on past disasters)
SOF *State Office for Mitigation Funding*	This newly created State Office was authorized by a recent act of the State Legislature. This Office will make funds available to local communities for hazard mitigation planning through an increase in the State's gasoline tax.	$5M
Manufactured Homebuilders Association	The State is interested in forming an agreement with this association to develop an earthquake-resistant homes campaign.	In-kind services
National Association of Homebuilders	The State is pursuing a relationship with this association and is discussing how the association can assist the State in promoting construction of safe rooms.	In-kind services

COORDINATION OF LOCAL MITIGATION PLANNING

§201.4(c)(4) requires that Standard State Mitigation Plans describe the process by which they provide funding and technical assistance for the development of Local Plans. This section also requires a description of the State's processes for incorporating local planning efforts into the statewide plan and prioritizing assistance to local jurisdictions.

When the State plans were originally prepared, there were few local plans that met FEMA's planning requirements under §201.6. Therefore, States had limited local information on which to base their plans. Since then, many local plans have been approved and adopted, providing States with the opportunity to better coordinate with local jurisdictions.

Section 201.4(d) requires that the State plan be updated regularly to address changes in development and mitigation priorities. This is reflected in the guidance language under §201.4(c)(4)(ii) and §201.4(c)(4)(iii).

This section includes the following three subsections:

- Local Funding and Technical Assistance
- Local Plan Integration
- Prioritizing Local Assistance

LOCAL FUNDING AND TECHNICAL ASSISTANCE

Requirement §201.4(c)(4)(i):

[The section on the Coordination of Local Mitigation Planning must include a] description of the State process to support, through funding and technical assistance, the development of local mitigation plans.

Explanation:

With a new requirement for local mitigation plans in DMA 2000, many communities will require additional assistance, particularly small communities without adequate resources to develop a plan. Therefore, the State **must** describe the process it has developed or will develop to provide funding and technical assistance to local jurisdictions to prepare mitigation plans. Funding sources may be Federal, State, or private (see page 1-47 of the Mitigation Strategies section).

The description *should* include the departments or staff responsible for providing funds, plan development assistance, and technical assistance for developing risk assessments. This description could be included as part of the goals, objectives, and actions in the Mitigation Strategy section.

Plan Update:

The updated plan **must** describe:

- The funding and technical assistance the State has provided since approval of the previous plan to assist local jurisdictions in completing approvable mitigation plans; and
- How the State will continue to provide this funding and technical assistance for new plans as well as local plan updates.

Recognizing the limitations of some States' authorities, the update *should* discuss how technical assistance will be used to improve the effectiveness of local plans, particularly those of the more vulnerable jurisdictions. Examples include but are not limited to:

- Assistance to local jurisdictions to include in their mitigation strategies effective an feasible mitigation projects;
- Planning workshops/training;
- Planning grant application development;
- HAZUS technical assistance;
- Improved risk assessment or hazard data;
- Extensive plan review feedback.

If disasters have occurred, States *should* discuss what steps they have taken or will take to encourage affected local jurisdictions to complete or update their mitigation plans to reflect changes in vulnerability or revised State priorities.

Resource:

For information about writing a detailed mitigation strategy, see:

✓ *Developing the Mitigation Plan* (FEMA 386-3), Step 3.

Examples:

Original Submittal:

Technical Assistance to Local Jurisdictions

The Hazard Mitigation Committee (HMC) provides technical assistance for plan development to local governments if requested by the jurisdiction.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(4)(i)		▪ The plan does not describe what funding support is available to local jurisdictions. ▪ The plan did not indicate how and what kind of technical assistance is provided to local governments. ▪ The plan did not indicate the staff or departments tasked with the responsibility of providing technical assistance or funding. ▪ Technical assistance should include an outreach component.

Required Revisions:

For a "Satisfactory" score, the plan must document the process followed to provide technical assistance and funding to local jurisdictions in the development of Local Plans.

Revised Submittal:

~~Technical Assistance to Local Jurisdictions~~ Plan Development Assistance

The Hazard Mitigation Committee (HMC) provides technical assistance **and funding to local jurisdictions that request such assistance** for plan development ~~to local governments if requested by the jurisdiction~~. **These resources are offered annually to local jurisdictions through a brochure indicating: 1) the types of technical assistance provided to jurisdictions (funding, planning process facilitation, risk assessment study, capability assessment study, hazard analysis, etc.); 2) the application procedure; and 3) the annual deadline for applications. Using the information presented on the submitted applications and the statewide risk assessment, the HMC prioritized jurisdictions for assistance based on 1) their vulnerability to hazards, 2) the lack of an updated hazard mitigation plan, 3) their access to geographic information systems and**

planning resources, and 4) the availability of local funds to conduct a planning process. The Plan Development Assistance Prioritization Matrix below summarizes this process.

Funds for planning assistance come from two Federal sources— the State's HMGP 7% planning assistance funds and the State's Pre-Disaster Mitigation Program funds — and one State source, the State Mitigation Action Fund. As a condition of having representation on the HMC, all member agencies have the responsibility to provide expertise to the local governments approved to receive assistance.

Plan Development Assistance Prioritization Matrix

County	Drought Risk	Flood Risk	Hurricane Risk	Wildfire Risk	Updated Plan?	County GIS Dept?	County Planning Dept.?	County Funds Available	Tech. Assistance Rank
Allwater	H	H	L	H					1
Bedlam	H	M	L	H	●		●		2
Calm-before-the-Storm	M	L	H	L	●	●	●	●	4
Turmoil	L	M	H	L	●		●		3

LOCAL PLAN INTEGRATION

Requirement §201.4(c)(4)(ii):	[The section on the Coordination of Local Mitigation Planning must include a] description of the State process and timeframe by which the local plans will be reviewed, coordinated, and linked to the State Mitigation Plan.
Update: §201.4(d):	**[The] plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities…**

Explanation:

The plan **must** include a description, as well as a timeline, of the State's approach for reviewing, coordinating, and integrating Local Plans into the statewide mitigation plan. An established process will streamline the review and approval of Local Plans, coordinate local and State planning efforts, and create a common knowledge base. While not required by the Rule, FEMA recommends listing the offices or departments responsible for these activities.

Plan Update:

The plan update process provides the opportunity for the State to assess how it reviews local plans and adjusts for any challenges or constraints to implementing its review process. The plan update **must** describe the process and timeframe by which the State reviews new and updated local plans for compliance with the Local Mitigation Plan requirements under 44 CFR Part 201.6.

The plan update **must** describe the process by which the State coordinates and links local plans to the State plan. The State plan update *should* identify areas where local jurisdictions utilized State plan information (e.g., risk assessment data) to complete their plans, or alternatively where local plan data were integrated into the State plan (e.g. local development trends). The State plan update *should* describe how the State reviewed local mitigation plans to ensure that State goals and objectives were supportive of local strategies. In this case, the State should coordinate with locals to ensure that identified mitigation goals are coordinated so that resulting hazard mitigation projects and actions result in similar ends.

Resource:

For more information about writing a detailed mitigation strategy, see:

- ✓ *Developing the Mitigation Plan* (FEMA 386-3), Step 3.

Examples:

See page 1-22 for how local plan risk assessment findings, when available, were reviewed and integrated into the statewide plan.

See page 1-43 for how locally identified mitigation actions are integrated into the statewide plan.

PRIORITIZING LOCAL ASSISTANCE

Requirement §201.4(c)(4)(iii):

[The section on the Coordination of Local Mitigation Planning must include] criteria for prioritizing communities and local jurisdictions that would receive planning and project grants under available funding programs which should include:

- consideration for communities with the highest risks,
- repetitive loss properties, and
- most intense development pressures.

Further that for non-planning grants, a principal criterion for prioritizing grants shall be the extent to which benefits are maximized according to a cost benefit review of proposed projects and their associated costs.

Update: §201.4(d):

[The] plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities…

Explanation:

The plan **shall** describe the criteria the State has developed for prioritizing local jurisdictions to receive planning and project grant assistance. Prioritization will assist the State in targeting the most at risk communities. The criteria for selecting communities *should* include those communities that are at highest risk, have repetitive loss properties, or are facing intense development pressure. The description can also include how assisting communities with their mitigation projects will achieve the plan's goals and objectives.

For project grants, States **shall** explain how they will use benefit-cost reviews to determine which projects maximize benefits relative to their costs. These projects would have the highest priority for available funding.

Plan Update:

The State **must** evaluate its approach to prioritizing local jurisdictions to receive planning and project grant assistance and provide a current description of its process. The plan *should* identify successes and challenges in its approach.

Resource:

For more information on writing a detailed implementation strategy, see:

- ✓ *Developing the Mitigation Plan* (FEMA 386-3), Step 3.

For information about performing benefit-cost analyses, call:

- ✓ *FEMA's BCA Hotline at 866.222.3580 to order the Mitigation BCA Toolkit (July 2003) CD.*

Examples:

See page 1-22 for how the most vulnerable jurisdictions were identified, and page 1-43 for how mitigation actions were prioritized.

PLAN MAINTENANCE PROCESS

The plan maintenance process section requires that States implement a mechanism to keep the plan updated to reflect current conditions. §201.4(c)(5) requires States to have an established method and schedule for monitoring, evaluating, and updating the plan. This includes a review of goals, objectives, and actions the State is undertaking.

The Standard State Plan must be updated and resubmitted to FEMA for approval every three years, as required in §201.4(d). While the Rule does not require the plan to be updated after a disaster declaration, FEMA highly encourages States to review it and determine if the goals, objectives, and actions still meet the needs of the State. If deemed necessary, these should be reprioritized to reflect current conditions. It is especially important to update the plan if the disaster is the result of a new hazard or is not addressed in the plan. This post-disaster update can be an annex to the plan.

The updated plan assesses how the State's plan maintenance process worked and identifies whether any changes to the process are needed. Taking into consideration future updates, the State may find that adjustments to the method and schedule for maintaining the plan are necessary to ensure its value for comprehensive risk reduction.

Since the plan is an evolving document, the plan maintenance process identified in any State plan serves as the basis for the next update. The process of updating the plan provides the State the opportunity to document its progress in achieving its mitigation goals.

This section includes the following two subsections:

- Monitoring, Evaluating, and Updating the Plan
- Monitoring Progress of Mitigation Activities

MONITORING, EVALUATING, AND UPDATING THE PLAN

Requirement §201.4(c)(5)(i):

[The Standard State Plan Maintenance Process must include an] established method and schedule for monitoring, evaluating, and updating the plan.

Explanation:

The plan maintenance process provides a framework for gauging progress and adjusting to new conditions, such as new policies, Federal requirements, and new initiatives.

The State **must** describe how, when, and by whom the plan will be **monitored**. For example, its monitoring system may consist of the submittal of periodic reports by agencies involved in implementing projects or actions; site visits, phone calls, and meetings conducted by the person responsible for overseeing the plan; and the preparation of an annual report that captures the highlights of the previously mentioned activities.

The State plan **must** also include a description of how, when, and by whom it will be **evaluated**. The description *should* include the criteria used to evaluate the plan, such as whether:

- The goals and objectives still address current and expected conditions.
- The nature and magnitude of hazard problems and/or development have changed.
- The current resources are appropriate for implementing the plan.
- There are implementation problems, such as technical, political, legal, or coordination with other agencies.
- The outcomes of actions have been as expected.
- The agencies participated as originally proposed.

Ideally, the plan *should* be evaluated on an annual basis to determine the effectiveness of programs, policies, and projects, as well as to reflect changes in priorities and regulations.

The plan **must** describe how, when, and by whom it will be **updated**. FEMA recommends identifying the interested parties to be included in the process.

Plan Update:

In the previously approved plan, the State identified procedures to **monitor**, **evaluate**, and **update** its mitigation plan and track mitigation activities. The results of this evaluation and monitoring will assist the State in updating each section of the plan as part of the established update schedule. In particular, the plan maintenance section of the previously approved plan should assist in establishing the process for updating the plan.

The updated plan **must** include:

- An analysis of whether the previously approved plan's method and schedule for monitoring, evaluating, and updating the plan worked, and what elements or processes, if any, were changed; and
- The method and schedule to be used over the next three years to monitor, evaluate, and update the plan.

Resource: For information on the plan maintenance process, see:

✓ *Bringing the Plan to Life* (FEMA 386-4), Steps 2 - 4.

Examples:

N S

Original Submittal:

The State recognizes that the Hazard Mitigation Plan is not a static document and requires regular review and evaluation. The State will review the Plan annually to ensure that the plan is being properly implemented and is achieving the objectives set forth in the plan. If necessary, the Plan will be reviewed after a disaster declaration has been made in the State. FEMA will be notified of any changes the plan, or will be given a justification of why no changes were deemed necessary.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(5)(i)		▪ The plan does not present a schedule for monitoring, evaluating, and updating the plan, nor does it designate a responsible agency. ▪ The plan does not describe how the mitigation plan will be updated.

Required Revisions:

The plan must include a schedule or timeline for monitoring, evaluating, and updating the plan. This section must also include a description of how the plan will be updated. Include specific agencies responsible for the monitoring, evaluation, and update of the plan.

N S

Revised Submittal:

The State recognizes that the Hazard Mitigation Plan is not a static document and requires regular review and evaluation. The State will review the Plan annually to ensure that the plan is being properly implemented and is achieving the objectives set forth in the plan. If necessary, the Plan will be reviewed after a disaster declaration has been made in the State.

The State has formed a Hazard Mitigation Plan Evaluation Committee that will be responsible for reviewing and evaluating the

Mitigation Plan. This committee consists of representatives from State, County, and municipal government; regional planning councils; independent special districts; and non-profit organizations. This committee will meet once a year, in March, and all members will be asked to analyze the overall success and progress in implementing the Plan.

The committee will review each goal and objective to determine their appropriateness with respect to changing situations in the State as well as changes in policy, and to ensure they are addressing current and expected conditions. The committee will also review the risk assessment and capabilities portion of the Plan to determine if this information needs to be updated or modified. Each strategy and the associated actions will be reported on by the party responsible for its implementation, and will include which implementation processes worked well, any difficulties encountered, how coordination efforts were proceeding, and which strategies or processes need to be revised or strengthened.

The committee will then create a list of recommendations that suggests ways to bring the Plan up to date, and any enhancements that can be made. The State Office of Planning will be responsible for making the necessary changes to the Plan, and the revised Plan must be submitted for approval by the State legislature no later than three months after the conclusion of the committee meeting.

FEMA will be notified of any changes to the plan, or will be given a justification of why no changes were deemed necessary.

In the case of a disaster declaration in the State, the Hazard Mitigation Plan can be updated if the State Office of Emergency Management believes this is necessary.

MONITORING PROGRESS OF MITIGATION ACTIVITIES

[The Standard State Plan Maintenance Process must include a]

- system for monitoring implementation of mitigation measures and project closeouts.
- system for reviewing progress on achieving goals as well as activities and projects in the Mitigation Strategy.

Explanation:

The plan **must** describe the State's monitoring system for tracking the initiation and status of projects as well as project closeouts, indicating who will be responsible for implementing and maintaining this system. This is important because without regular monitoring, mitigation actions may not be implemented as planned.

The plan **must** also describe how the State reviews the progress made on actions and projects and how well these contribute to achieving the plan's goals. The description **must** also include who is involved in the review and what the timeframe is for carrying out the review.

Plan Update:

The update **must:**

- Describe any modifications to the State's system used to track the initiation, status, and completion of mitigation activities;
- Discuss if mitigation actions were implemented as planned; and
- Indicate who will be responsible for continued management and maintenance of the monitoring system, including the timeframe for carrying out future reviews.

The system identified in this section of the plan will support demonstration of progress in statewide mitigation efforts under §201.4 (c)(3)(iii).

The update *should*:

- Describe any challenges that hindered implementation of mitigation measures and project close-outs and how these will be dealt with in the future. These could include technical, political, financial, legal, or agency coordination issues; and
- Describe any factors that contributed to successful implementation of mitigation measures.

Resource:

For information on the plan maintenance process, see:

✓ *Bringing the Plan to Life* (FEMA 386-4), Steps 3 and 4.

Examples:

Original Submittal:

Mitigation Division staff are responsible for the monitoring and tracking of progress of mitigation actions. The Division has an established quantifiable approach for measuring outcomes.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.4(c)(5)(ii) and (iii)		▪ While the plan indicates who is responsible for monitoring progress, the plan does not describe the approach being used. ▪ The plan does not describe the Division's approach for measuring outcomes nor how these are tied to the plan's overall goals.

Required Revisions:

To receive a "Satisfactory" score, the State must set up a schedule and assign responsibility and resources for monitoring and evaluating mitigation actions and project close-outs as well as progress on goals and projects. While not required by the Rule, special attention should also be given as to when baseline data would be updated to keep the plan current.

Revised Submittal:

Mitigation Division staff are responsible for the monitoring and tracking of progress of mitigation actions. ~~The Division has an established quantifiable approach for measuring outcomes~~. **The Division chief has assigned one person to follow-up with other agency staff on a quarterly basis. The person collects quarterly reports on measurable outcomes, which are then input into a database accessible to all participating agencies. Once a year these staff meet to review overall progress on achieving the plan's goals. This team has developed an evaluation form (see Appendix XX) that addresses outcomes or the success of projects; assesses new information provided through research and disaster assessment reports to update the baseline data; verifies project close-outs; and reviews the level of coordination among agencies, a key to the success in implementing the plan. A subcommittee of State University professors convenes once a year to review the new information and make recommendations to the HMC for updating the baseline data used in the risk analysis. This information is used to reassess project prioritization as necessary.**

Goals, objectives, and projects will be reviewed in the event of a disaster to determine whether they need to be modified to reflect

the new conditions and the findings appended to the existing plan.

The Mitigation Division regularly updates the State mitigation Web site with mitigation actions that have been successfully completed.

SEVERE REPETITIVE LOSS STRATEGY

On June 30, 2004, the National Flood Insurance Act (42 U.S.C. 4001 et seq.) was amended to introduce a mitigation plan requirement as a condition of receiving a reduced local cost share for activities that mitigate severe repetitive loss properties under the Flood Mitigation Assistance (FMA) and Severe Repetitive Loss (SRL) grant programs. The October 31, 2007, interim final rule established this requirement under 44 CFR §201.4(c)(3)(v) to allow a State to request the reduced cost share under the FMA and SRL programs if it has an approved State Mitigation Plan that also includes an approved Severe Repetitive Loss Strategy.

Severe repetitive loss properties are defined as single or multifamily residential properties that are covered under a National Flood Insurance Program (NFIP) flood insurance policy and:

(1) That have incurred flood-related damage for which 4 or more separate claims payments have been made, with the amount of each claim (including building and contents payments) exceeding $5,000, and with the cumulative amount of such claims payments exceeding $20,000; or

(2) For which at least 2 separate claims payments (building payments only) have been made under such coverage, with cumulative amount of such claims exceeding the market value of the building.

(3) In both instances, at least 2 of the claims must be within 10 years of each other, and claims made within 10 days of each other will be counted as 1 claim.

In order to be eligible for a reduced cost share under the FMA or SRL grant programs, the State must have at the time of project application a FEMA-approved State or Tribal Standard Mitigation Plan that also meets the requirement described in the two sections below.

- Repetitive Loss Mitigation Strategy
- Coordination with Repetitive Loss Jurisdictions

Special Considerations: States and Federally recognized Indian Tribes are not required to meet the requirements of 44 CFR §201.4(c)(3)(v) to be eligible for mitigation assistance under any FEMA mitigation grant programs at the standard 75 percent Federal cost share. However, they are encouraged to amend their plans to include a strategy for mitigating severe repetitive loss properties in order to be eligible to receive an increased Federal cost share of up to 90 percent for grants under the FMA and SRL grant programs. States may address the severe repetitive loss strategy through either an amendment to their existing FEMA approved State or Tribal Mitigation Plan, or during the review and update of their Plan.

REPETITIVE LOSS MITIGATION STRATEGY

Requirement 44 C.F.R. §201.4(c)(3)(v): A State may request the reduced cost share authorized under §79.4(c)(2) of this chapter for the FMA and SRL programs, if it has an approved State Mitigation Plan … that also identifies specific actions the State has taken to reduce the number of repetitive loss properties, which must include properties identified as severe repetitive loss, and specifies how the State intends to reduce the number of such repetitive loss properties.

Explanation: This requirement supplements the risk assessment and mitigation strategy portions of the plan required under §§ 201.4(c)(2) and (3) by specifically identifying goals, capabilities and actions that will reduce the number of repetitive loss properties, including severe repetitive loss properties.

The mitigation strategy is based on the State's *Risk Assessment* as required under §201.4(c)(3)(ii). Therefore, the State **must** address repetitive loss structures in its risk assessment, where applicable. For example, in its overview of *Estimating Potential Losses by Jurisdiction* under §201.4(c)(2)(iii), the State may analyze potential losses to identified repetitive loss properties based on estimates provided in local risk assessments. The Plan *should* refer generally to geographic areas where concentrations of repetitive loss properties are located for the purpose of identifying and prioritizing areas for mitigation projects, or the plan may list the number of repetitive loss properties with aggregate repetitive loss data.

The State *Hazard Mitigation Goals* under §201.4(c)(3)(i) **must** support the selection of activities to mitigate and reduce potential losses to structures susceptible to flood damage, including repetitive loss properties. In addition, the *State* and *Local Capability Assessments* required under §201.4(c)(3)(ii) **must** include an evaluation of policies, programs, and capabilities that allow the mitigation of repetitive losses from flood damage.

The State **must** describe specific actions that it has implemented to mitigate repetitive loss properties, and specifically actions taken to reduce the number of *severe repetitive loss properties* as a subset of all repetitive loss properties in the State. If the State cannot show that any action has ever been taken to reduce the number of such properties, this criteria cannot be met.

Based on the findings of the risk assessment, the State **must** identify actions in the statewide mitigation strategy that specifically address repetitive loss properties, including those that are severe repetitive loss properties. This supplements the mitigation actions requirement under §201.4(c)(3)(iii). Mitigation actions *should* be tied to goals and objectives and provide the means to achieve them. Actions *should* have been identified in the planning process, and local plans *should* be consistent with state-wide actions.

As part of the mitigation strategy, the plan **must** also describe the current funding sources as well as potential sources that will be pursued

to fund proposed mitigation actions for repetitive loss properties. This supplements the identification of funding requirement under §201.4(c)(3)(iv).

Plan Update: The updated plan **must** specifically address repetitive loss properties, including severe repetitive loss properties, in accordance with the Plan Update requirements for the State's Risk Assessment under §201.4(c)(2) and under each of the criteria under the State's *Mitigation Strategy* under section 201.4(c)(3).

In addition, the updated plan **must** identify the completed actions or activities since the previously adopted plan as a benchmark for progress. If no mitigation actions or activities have been taken since the previously approved plan, the updated plan **must** indicate why the State has not been able to complete these actions.

COORDINATION WITH REPETITIVE LOSS JURISDICTIONS

Requirement 44 C.F.R. §201.4(c)(3)(v): In addition, the plan must describe the strategy the State has to ensure that local jurisdictions with severe repetitive loss properties take actions to reduce the number of these properties, including the development of local mitigation plans.

Explanation: The State is required to identify strategies that encourage local communities to mitigate severe repetitive loss properties, including the development of local mitigation plans. This supplements the *Coordination of Local Mitigation Planning* portion of the plan under §201.4(c)(4). At a minimum, the State **must** include severe repetitive loss in the description of its process for providing funding and technical assistance to prepare mitigation plans (§201.4(c)(4)(i)), and in its criteria for prioritizing communities that have such properties for planning and project grant assistance (§201.4(c)(4)(iii)). Other strategies for encouraging local communities to mitigate severe repetitive loss properties *should* be demonstrated through specific actions identified in the *Mitigation Strategy*.

Plan Update: The updated plan **must** specifically address repetitive loss properties, including severe repetitive loss properties, in accordance with the Plan Update requirements for the State's *Coordination of Local Mitigation Planning* under §§201.4(c)(4)(i) and (iii).

PART 2 – ENHANCED STATE MITIGATION PLANS

An Enhanced State Mitigation Plan documents the State's demonstrable and sustained commitment to the objectives of hazard mitigation. This designation recognizes the State as a proactive leader in implementing a comprehensive statewide program. The enhanced status acknowledges the extra effort a State has made to reduce losses, protect its resources, and create safer communities. For mitigation plans to receive this designation, the State must obtain a "Satisfactory" score on all of the Standard State Plan requirements as described in Part 1 of this manual. In addition, it must receive a "Satisfactory" score on each of the Enhanced State requirements.

The June 2007 revisions to this Guidance provide important new information regarding compliance with the Standard State Mitigation Plan requirements as discussed at 44 CFR 201.5(b). This change applies to both new and updated Enhanced State Mitigation Plans.

The sections covered in Part 2 – Enhanced State Mitigation Plans include:

- Prerequisite
- Comprehensive State Hazard Mitigation Planning Program

PREREQUISITE

The State submitting a mitigation plan for designation as an Enhanced State Mitigation Plan must meet the following prerequisite before FEMA can approve the plan.

1. COMPLIANCE WITH STANDARD STATE PLAN REQUIREMENTS

Requirement §201.5(b):	Enhanced State Mitigation Plans must include all elements of the Standard State Mitigation Plan identified in §201.4 … .

Explanation:

(Rev. June 2007)

In order to be considered for Enhanced Plan status, the plan **must** contain all the elements of the Standard Plan (per §201.4), in addition to meeting all the requirements listed in §201.5. All the elements required for the Standard Plan **must** receive a score of "Satisfactory" before the plan is reviewed for compliance with the Enhanced State requirements.

All Enhanced State Mitigation Plans submitted for FEMA's approval on or after January 1, 2008, **must** include a current update of their Standard Plan elements. Each State should submit its draft Mitigation Plan to FEMA's Regional Office early enough to allow sufficient time for:

1. Region's review of all required elements (Standard and Enhanced portions);
2. Region's review of the State's program management capability;
3. National Evaluation Panel's review;
4. State completion of any required revisions to the plan; and
5. Adoption of the plan by the State and approval by FEMA before the existing plan expires.

Plan Update:

If the Enhanced elements of the State Mitigation Plan are not approved prior to the expiration of the existing plan, but the Standard requirements have been met, the FEMA Region may approve the plan as a Standard Plan. This will ensure continued program eligibility for the State, while still allowing the Enhanced review process and any required revisions to be completed. The approved Plan will be held to the initial three-year approval timeframe, and will not be extended as a result of any additional time needed for review, revision or approval of the Enhanced portion of the plan. This requirement is intended to ensure that (1) all plans are based on the most current information and (2) that there is a single approval date for each State Mitigation Plan.

To provide consistency between the Standard and Enhanced sections of the plan, the updated Enhanced portion of the Plan **must** be revised as necessary to be consistent with all updates to the Standard portion of the Plan.

Resource: For more information on preparing and implementing a mitigation plan, see:

- ✓ *Developing the Mitigation Plan* (FEMA 386-3), Step 3.
- ✓ *Bringing the Plan to Life* (FEMA 386-4), Step 2.

COMPREHENSIVE STATE HAZARD MITIGATION PLANNING PROGRAM

44 CFR §201.5 addresses Enhanced State Mitigation Plans. This is FEMA's effort to recognize those States that go above and beyond the minimum mitigation requirements by making them eligible to receive an increased amount of mitigation grant funding. Strong State and local mitigation planning processes and comprehensive mitigation program management at the State level are important elements in reducing vulnerability to future disaster losses. It is hoped that the Enhanced Plan option will encourage more States to take their planning to a higher level. For the Enhanced State Plan, States must meet all of the requirements of the Standard Plan, plus be able to demonstrate that the State already has a comprehensive mitigation program, demonstrate that they effectively use available mitigation funding, and demonstrate that they are capable of managing the increased funding.

The plan update process provides States the opportunity to revisit the information they originally provided to demonstrate these capabilities. Any improvement, reduction, or other changes to these capabilities should be noted in the plan.

This section includes the following six subsections:

- Integration with Other Planning Initiatives
- Project Implementation Capability
- Program Management Capability
- Assessment of Mitigation Actions
- Effective Use of Available Mitigation Funding
- Commitment to a Comprehensive Mitigation Program

2. INTEGRATION WITH OTHER PLANNING INITIATIVES

Requirement §201.5(b)(1):

[An Enhanced Plan must demonstrate] that the plan is integrated to the extent practicable with other State and/or regional planning initiatives (comprehensive, growth management, economic development, capital improvement, land development, and/or emergency management plans) and FEMA mitigation programs and initiatives that provide guidance to State and regional agencies.

Explanation:

(Rev. June 2007)

This requirement is similar to §201.4(b) for the Standard Plan, which is discussed previously in *Program Integration* (page 1–11), except that it also requires the State to detail how the Enhanced Plan is specifically integrated into other State, regional, and FEMA initiatives that provide primary guidance for hazard mitigation-related activities.

States might demonstrate that they have integrated the plan with planning initiatives that provide guidance by describing such activities as coordinating with developers of State plans (e.g., statewide economic development, capital improvement, or public works plans) to incorporate hazard mitigation priorities; passing State laws or regulations that mandate integration of mitigation considerations with other planning initiatives at the State level; and/or working with Regional Planning Authorities or Councils of Government.

When applying this requirement, reviewers should keep in mind the differences in planning conditions among States. For example, in States with extensive planning resources, integration with other plans may be more comprehensive. However, States with limited resources and little tradition of collaboration across agencies should receive credit for demonstrating measurable progress towards integration of efforts.

Examples of demonstrated integration with State and/or regional planning initiatives could include:

- How the State currently influences or coordinates with other State and regional agencies to incorporate hazard mitigation into their own programs, regulations and activities.
- How other agencies incorporate mitigation data or resources into their planning initiatives;
- How other State or regional agencies' planning initiatives are linked to or support specific hazard mitigation strategies;
- How other State or Regional planning initiatives promote mitigation as part of their authorities and responsibilities.

Examples of demonstrated integration with FEMA programs and initiatives that provide guidance to State and Regional agencies could include FEMA mitigation grant programs, as well as:

- Use of HAZUS within the State Plan and/or a description of how the State encourages or supports the use of HAZUS in the development of local mitigation plans;

- Discussion of how the mitigation plan is linked to Flood Map Modernization activities within the State;
- How the State utilizes information provided in FEMA technical documents related to building construction, codes and standards to incorporate mitigation into retrofitting existing buildings and/or strengthening new development;
- How the Enhanced Plan guides activities funded by Emergency Management Program Grants (EMPG); and/or
- How the Enhanced Plan encourages and supports local government participation in the Community Rating System (CRS) of the National Flood Insurance Program (NFIP).

Plan Update: States **must** demonstrate continued integration of the mitigation plan with other state and/or regional planning initiatives as well as FEMA mitigation programs. The update **must** include any planning initiatives that have been established since approval of the previous plan and describe how those initiatives help achieve progress toward the overall goals and objectives of mitigation planning.

Resource: For more information on integrating hazard mitigation activities in other initiatives, see:

- ✓ *Getting Started* (FEMA 386-1), Step 1.
- ✓ *Bringing the Plan to Life* (FEMA 386-4), Step 2.

Examples:

Original Submittal:

Integration with Other Planning Initiatives

In furthering the concept and practice of hazard mitigation across the State, the Hazard Mitigation Committee (HMC) created a subcommittee to explore the feasibility of integrating State hazard mitigation planning with other statewide planning initiatives such as the State Smart Growth initiative and the State economic development plan.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.5(b)(1)		▪ While it is encouraging that the HMC created a subcommittee to explore integration with other planning initiatives, a strategy to promote integration has not yet been developed.

Required Revisions:

The submittal must explain the steps that the planning committee has

taken or intends to take to integrate hazard mitigation.

Revised Submittal:

Integration with Other Planning Initiatives

In furthering the concept and practice of hazard mitigation across the State, the Hazard Mitigation Committee (HMC) created a subcommittee to explore the feasibility of integrating State hazard mitigation planning with other statewide planning initiatives such as the State Smart Growth initiative and the State economic development plan. **The subcommittee developed the following strategy to further this work:**

- **The State Hazard Mitigation Officer met with the Director and Assistant Director of the State Economic Development Agency to discuss integration of hazard mitigation concepts into economic development initiatives. The meeting produced a commitment from the Director to invite HMC representatives to participate in upcoming strategic planning sessions. The strategic plan is to be completed before the next budget cycle.**
- **The Governor's Authorized Representative, who co-chairs the HMC, has agreed to have the Governor's office develop an executive order directing State agencies to work with the HMC to integrate hazard mitigation concepts into State operations where feasible.**
- **The HMC is developing a presentation and training program to educate State workers about the need for hazard mitigation and the ways that mitigation can be integrated into everyday operations.**
- **The State Smart Growth Office, a strong supporter of hazard mitigation, and with representation on the HMC, has developed a new position, Hazard Reduction Policy Coordinator. The Coordinator is the first paid hazard mitigation employee hired by the State who is outside the State Office of Emergency Preparedness.**

These new initiatives will create a comprehensive approach to reducing losses in the State. The State's CRS and FMA programs have been in place since these programs were created. Additionally, the State received PDM funding for all planning and project grant applications it submitted in fiscal year 2004.

3. PROJECT IMPLEMENTATION CAPABILITY

Requirement §201.5(b)(2)(i) and (ii):

[The Enhanced Plan must document] the State's project implementation capability, identifying and demonstrating the ability to implement the plan, including:

- Established eligibility criteria for multi-hazard mitigation measures.
- A system to determine the cost effectiveness of mitigation measures, consistent with OMB Circular A-94, Guidelines and Discount Rates for Benefit-Cost Analysis of Federal Programs, and
- [A system] to rank the measures according to the State's eligibility criteria.

Explanation:

(Rev. June 2007)

These requirements build on §201.4(c)(3)(ii), which is discussed in the sections on State and local capability assessment on pages 1-37 through 1-42. However, while §201.4(c)(3)(ii) requires that the State demonstrate its capabilities to implement policies and programs to mitigate hazards, §201.5(b)(2)(i) requires that States identify their eligibility criteria for mitigation actions during the planning process.

Development of such criteria was formerly undertaken during the *grant application process*. These eligibility criteria should be integral to developing a State's mitigation strategy where, ideally, mitigation actions would be categorized by short, medium, and long-term timeframes and then further prioritized as high, medium, or low.

Per §201.5(b)(2)(ii), States **must** also describe their approach to evaluating the cost-effectiveness of identified actions and explain or demonstrate how this approach is consistent with OMB Circular A-94. The description should include the agency and staff responsible for conducting benefit-cost analyses, reviews, or any other assessment method used.

For all State and FEMA mitigation programs, the plan **must** describe how the State ranks mitigation measures according to its eligibility criteria. The system **must** include a process for prioritizing projects among jurisdictions and among proposals that address different or multiple hazards. The system does not have to be a point system or grading scale but should clearly explain how projects are prioritized.

Plan Update:

The documentation of project implementation capability **must** explain any changes to eligibility criteria, including any that have been added or eliminated since the approval of the previous plan, and any changes to the system of determining the cost effectiveness of mitigation measures consistent with OMB Circular A-94.

States **must**, at a minimum, ensure their Mitigation Plan includes eligibility criteria and a system for cost effectiveness determination for **all** State and FEMA mitigation grant programs (HMGP, FMA, PDM, SRL, RFC). Project implementation procedures for HMGP may be directly included in the State Mitigation Plan or referenced back to the HMGP

Administrative Plan.

Resource: For information on prioritizing actions and determining eligibility, and for a discussion about methods to determine cost effectiveness, see respectively:

- ✓ *Developing the Mitigation Plan* (FEMA 386-3), Step 2.
- ✓ *Mitigation Benefit Cost Analysis (BCA) Toolkit Compact Disc (CD).*
- ✓ *OMB Circular A-94: See http://www.whitehouse.gov/omb/circulars/a094/a094.html*

Examples:

N/S

Original Submittal:

During the formation of its Mitigation Strategy, the State developed eligibility criteria for determining how hazard mitigation projects will be addressed. These criteria were initially developed for the HMGP application and have been revised.

Each County within the State provided a prioritized list of mitigation projects for their municipalities. These projects included such things as buyouts for repetitive flood loss properties, the building of tornado shelters, the application of certain communities to the CRS program, and the development of new routes for the transportation of hazardous materials. The State then categorized these projects by their priority to the County, their cost, and the timeframe for implementation.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.5(b)(2) (i) and (ii)		▪ The plan does not list the eligibility criteria, the method used to determine cost effectiveness, or the system for ranking actions.

Required Revisions:

The plan must list its eligibility criteria and address how cost-benefit analysis, review, or other methods were used to determine cost effectiveness of actions. It must also describe the system for ranking eligible actions.

N S

Revised Submittal:

During the formation of its Mitigation Strategy, the State developed eligibility criteria for determining how hazard mitigation projects will be addressed. ~~These criteria were initially developed for the HMGP~~

~~application and have been revised.~~ **This was done through the State Hazard Mitigation Planning Committee in regular meetings with the Counties. The eligibility criteria requires projects to:**

- **Be cost effective.**
- **Address repetitive loss properties.**
- **Be located in the most vulnerable areas identified in the State Hazard Mitigation Plan.; and**
- **Have local matching funds (including in-kind contributions).**

~~Each County within the State provided a prioritized list of mitigation projects for their municipalities. These projects included such things as buyouts for repetitive flood loss properties, the building of tornado shelters, the application of certain communities to the CRS program, and the development of new routes for the transportation of hazardous materials. The State then categorized these projects by their priority to the County, their cost, and the time frame for implementation.~~

The State helped the Counties apply a cost-benefit analysis to their proposed mitigation projects. The Counties used this analysis to prioritize their projects. Projects were prioritized by such items as frequency of the disaster being mitigated, financial impact to the community, human losses, and timeframe for completion. For example, flooding is the biggest concern in certain areas of the State, whereas in the "flats" tornadoes are the major concern. Each County has a different prioritization for hazard mitigation projects within its jurisdiction (see Appendix XX for a list of criteria provided by County).

The State is then responsible for prioritizing each of the County's projects with respect to how much and when State help will be available. The State takes the number one priority for each County and then ranks these projects by giving a certain number of points to as follows:

- **Cost effectiveness (i.e., those projects that demonstrate that they are the most cost effective) (20 to 35 points).**
- **Listing on the Repetitive Loss Property List (40 points).**
- **Location within the most vulnerable areas in the State (10 to 25 points).**

In addition to funding, the State provides support to the Counties in several ways, including actual project implementation, seeking additional funding, project support, public involvement activities, and the provision of additional information (see Appendix XX for a list of ranked projects).

The State Hazard Mitigation Committee (HMC) tracks when and how projects are being implemented, as well as how their funding is being used (see Section XX of the plan for more details). If there is a problem or conflict with a project, the State acts as a mediator to resolve the problem as quickly and efficiently as possible. The State

also conducts "lessons learned" meetings with Counties as necessary. As projects are completed, the State makes note of this in each County's file and maintains records on every project.

4. PROGRAM MANAGEMENT CAPABILITY

Requirement §201.5(b)(2)(iii A-D):

[The Enhanced Plan must demonstrate] that the State has the capability to effectively manage the HMGP as well as other mitigation grant programs, [and provide] a record of the following:

- Meeting HMGP and other mitigation grant application timeframes and submitting complete, technically feasible, and eligible project applications with appropriate supporting documentation;
- Preparing and submitting accurate environmental reviews and benefit-cost analyses;
- Submitting complete and accurate quarterly progress and financial reports on time; and
- Completing HMGP and other mitigation grant projects within established performance periods, including financial reconciliation.

Explanation:

(Rev. June 2007)

Because approval of an Enhanced Plan results in increased HMGP grant funding, this section requires States to demonstrate their capabilities to effectively manage the HMGP and other mitigation grant funds, including funds from the Pre-Disaster Mitigation (PDM), Flood Mitigation Assistance (FMA) and Repetitive Flood Claims (RFC) programs, they have previously received. FEMA Regional offices will evaluate and certify that the State has the capability to effectively manage FEMA mitigation grant programs. The State is currently not required to document this in their plan.

The criteria that are used for this evaluation are currently being refined and will be revised with State input. FEMA has been utilizing an *Enhanced State Multi-Hazard Mitigation Plan Program Information Worksheet*, dated May 2005, to evaluate the requirements under §201.5(b)(2)(iii A-D). This worksheet will continue to be utilized until the revised criteria are issued. The revised criteria will not be implemented immediately upon release, but will be effective a sufficient interval of time after publication to allow the State to demonstrate capability under the revised criteria.

Plan Update:

Any update of this element will be successfully met through the State's continued demonstration that, for the past 3-year period, it has maintained the capability to effectively manage the HMGP as well as other mitigation grant programs. FEMA regional offices will re-evaluate and re-certify that, for the past 3-year period, the State has demonstrated the capability to effectively manage the HMGP and other mitigation grant programs.

5. ASSESSMENT OF MITIGATION ACTIONS

Requirement §201.5(b)(2)(iv):	[The Enhanced Plan must document the] system and strategy by which the State will conduct an assessment of the completed mitigation actions and include a record of the effectiveness (actual cost avoidance) of each mitigation action.

Explanation:

§201.5(b)(2)(iv) builds on §201.4(c)(5)(ii) and (iii), which were discussed previously in *Monitoring Progress of Mitigation Activities* (page 1-59). States **must** describe how they would assess the effectiveness of each completed mitigation action, what agency or agencies will be involved in the assessment, and indicate the timeframe for carrying out this assessment. The results of this assessment will be necessary during the next plan update to verify achievement of the plan's goals and objectives, and to fine-tune or revise the mitigation strategy.

The State **must** describe how it will track potential losses avoided for each action taken (e.g., by developing a database or GIS system) since, in many cases, losses avoided cannot be accurately determined until a disaster occurs and damages are assessed.

Plan Update:

States **must** describe how they assessed, and how they will continue to assess, the effectiveness of completed mitigation actions, including discussion of those agencies whose involvement was initially proposed and those who actually participated in the assessment, and the timeframe required to complete the assessment.

The State **must** describe how it tracked, and will continue to track, potential losses avoided for each action taken. Where disasters have occurred since the approval of the previous plan, the update **must** include a record of the actual cost avoidance of each completed mitigation action.

FEMA recognizes that there may be unforeseeable situations where, due to the timing, magnitude of one or more disaster(s) and/or the large number of completed mitigation actions for which losses avoided must be assessed, it is impracticable for the State to complete the assessment of losses avoided within the timeframe by which the updated plan must be submitted to FEMA for approval. If such a situation exists, the plan **must**:

- Include a discussion of the unforeseeable circumstances (including timing of the event or events and the number of mitigation actions for which losses avoided must be assessed);
- The system or approach that will be used to assess losses avoided, and
- A proposed timeframe for completing this work.

Resource:

For information on how to evaluate the effectiveness of mitigation actions see:

Bringing the Plan to Life (FEMA 386-4), Step 3.

Examples:

Original Submittal*:*

The State has established a method to determine the effectiveness of mitigation actions being undertaken in the State. During the preparation of the State Hazard Mitigation Plan, the State partnered with the State University to develop several economic analysis models to determine the economic feasibility of various past mitigation actions. One of these models considered reductions in physical damages and financial losses that helped determine the effectiveness of mitigation actions by showing the resulting reduction in damages and losses. Other models showed various cost-benefit analyses to help communities decide which mitigation activities to implement.

Several of the State's communities currently have hazard mitigation plans in place. The economic models can be applied to those existing plans as well as help communities who are in the process of developing hazard mitigation plans. The State will provide help to the local communities in running and analyzing the economic models.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.5(b)(2)(iv)		▪ The State is active in trying to assess the effectiveness of its mitigation actions; however, no specifics are given. ▪ It is not clear what agency or agencies will be responsible for developing and implementing the economic modeling analyses or how the local communities will benefit.

Required Revisions:

The plan must provide specific information about how the effectiveness of mitigation actions will be assessed. Specific agency or agencies must be mentioned and a timeframe for conducting these assessments must be developed.

Revised Submittal:

~~The State has established a method to determine the effectiveness of mitigation actions being undertaken in the State. During the preparation of the State Hazard Mitigation Plan, the State partnered with the State University to develop several economic analysis models to determine the economic feasibility of various past mitigation actions. One of these models considered reductions in physical damages and financial losses that helped determine the effectiveness of mitigation actions by showing the resulting reduction in damages and losses. Other models showed~~

~~various cost-benefit analyses to help communities decide which mitigation activities to implement.~~

As part of the State Hazard Mitigation Plan, the State Office of Economic Development partnered with the State University to develop several economic models to assess the losses avoided by various mitigation actions. These models used hazard data from recent events to determine the likely damages to structures *had mitigation actions not taken place*. The models then used the probability of the event to calculate the avoided damages based on the net present value of the benefits.

~~Several of the State's communities currently have hazard mitigation plans in place. The economic models can be applied to those existing plans as well as help communities who are in the process of developing hazard mitigation plans. The State will provide help to the local communities in running and analyzing the economic models.~~

The Office of Economic Development is working with local communities to help them apply these analyses. A majority of the State's communities already have implemented some mitigation actions, and these models can be applied to quantify the benefits of mitigation activities identified in previous mitigation plans. The State Office of Planning is working with the remainder of the communities to develop hazard mitigation plans, whereupon economic feasibility analyses can be applied to specific mitigation strategies.

Following hazard events in the areas receiving mitigation action, communities will be required to show what damages and losses have been avoided (e.g., structural damages prevented, business inventory damages prevented, rental income losses avoided, personal property losses prevented) by implementing their mitigation strategies. The communities are allowed discretion in determining how they will track losses avoided (e.g., utilizing GIS or database technology).

The Office will review these analyses and provide feedback to the communities. The Office of Economic Development will conduct yearly checks on the communities to ensure that they are using these analyses effectively. It is recognized that non-economic factors are a major consideration and are difficult to incorporate into economic modeling.

6. EFFECTIVE USE OF AVAILABLE MITIGATION FUNDING

Requirement §201.5(b)(3):	**[The Enhanced Plan must demonstrate] that the State effectively uses existing mitigation programs to achieve its mitigation goals.**
Explanation:	In order for FEMA to increase the amount of HMGP funding available to a State in subsequent disasters, it is important that the State document that it has fully and effectively made use of FEMA and other funding already at its disposal. States **must** demonstrate how they have taken advantage of FEMA programs, such as FMA, HMGP, PDM, SRL and RFC to fund mitigation actions. If States have used other FEMA and non-FEMA funding to support mitigation, they *should* include this documentation as well. The State *should also* discuss how it leveraged its own funds (i.e., to provide match or cost share) with FEMA or other federal programs to implement mitigation.
(Rev. June 2007)	If the State has not made full use of existing mitigation programs, the plan **must** explain the reasons why. Acceptable reasons include, but are not limited to, unavailable non-federal match, uninterested property owners, or insufficient program funds to implement prioritized mitigation actions. Limited staff resources is not considered an acceptable reason, and would invalidate §201.5(b)(2)(iii) that requires the State to demonstrate program management capability (see pages 2-12 and 2-13, Part 1, items A.1. through A.4.).
	In addition to describing actions and projects that have been implemented, the plan **must** link the projects to specific State goals and objectives and assess the effectiveness of the projects in achieving the goals.
	The plan *should* also describe the State's strategy for ensuring continued effective use of resources (e.g., forming partnerships to leverage funding).
Plan Update:	The updated plan **must** document how the State has fully made use of funding available through FEMA mitigation programs, including the HMGP, PDM, FMA, SRL and RFC programs.
	The updated plan **must** also document how the State effectively uses existing mitigation programs to achieve its mitigation goals.
Resource:	For information on how to evaluate the effectiveness of mitigation actions in achieving the plan's goals, see: ✓ *Bringing the Plan to Life* (FEMA 386-4), Step 3.

Examples:

N/S

Original Submittal:

The State uses a variety of funds and programs to achieve its mitigation goals, including the Flood Mitigation Assistance Program (FMA), the Hazard Mitigation Grant Program (HMGP), and the State Hazard Mitigation Assistance Initiative (HMAI).

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.5(b)(3)		▪ The plan needs to explain *how* the State has taken advantage of all of the hazard mitigation opportunities currently available to them.

Required Revisions:

The revised plan must explain how the State uses Federal and State hazard mitigation funds and programs to achieve its goals, including the possible combination of two or more funding programs.

N S

Revised Submittal:

The State uses a variety of funds and programs to achieve its mitigation goals, including the Flood Mitigation Assistance Program (FMA), the Hazard Mitigation Grant Program (HMGP), and the State Hazard Mitigation Assistance Initiative (HMAI). **These are described below:**

Flood Mitigation Assistance Program (FMA): The State has facilitated the use of FMA funds by local governments for the development of local hazard mitigation plans and projects. The State Hazard Mitigation Grant Coordinator visits each County yearly to develop local project applications and provides project management oversight for the grant. The State's goal is to have one-quarter of its communities using FMA project, planning, or technical assistance funds each year to help fund planning initiatives, projects, or flood hazard studies.

Hazard Mitigation Grant Program (HMGP): The State has facilitated the use of HMGP funds for post-disaster hazard mitigation projects. Because HMGP funds are post-disaster funds and their availability from year to year is uncertain and limited, the State only allows funding for local projects that are captured in existing local hazard mitigation strategies. Also, the State uses its 5% HMGP set-aside to help fund State technical assistance to local governments.

State Hazard Mitigation Assistance Initiative (HMAI): The State can provide up to 12.5% matching funds through the HMAI to help fund local hazard mitigation projects implemented through HMGP or FMA. These funds are provided to localities based first on need (i.e., there are few local resources to meet the 25% match requirement for Federal grants), and then on a competitive basis that compares benefit-cost analyses, environmental compatibility and justice, and political viability across jurisdictions.

7. COMMITMENT TO A COMPREHENSIVE MITIGATION PROGRAM

Requirement §201.5(b)(4)(i-vi):

[The Enhanced Plan must demonstrate] that the State is committed to a comprehensive state mitigation program, which might include any of the following:

- A commitment to support local mitigation planning by providing workshops and training, State planning grants, or coordinated capability development of local officials, including Emergency Management and Floodplain Management certifications.
- A Statewide program of hazard mitigation through the development of legislative initiatives, mitigation councils, formation of public/private partnerships, and /or other executive actions that promote hazard mitigation.
- The State provides a portion of the non-Federal match for HMGP and/or other mitigation projects.
- To the extent allowed by State Law, the State requires or encourages local governments to use a current version of a nationally applicable model building code or standard that addresses natural hazards as a basis for design and construction of State sponsored mitigation projects.
- A comprehensive, multi-year plan to mitigate the risks posed to the existing buildings that have been identified as necessary for post-disaster response and recovery operations.
- A comprehensive description of how the State integrates mitigation into its post-disaster recovery operations.

Explanation:

The intent of this requirement is to allow States to describe mitigation-related activities that do not necessarily have a basis in a program or regulation. These activities truly show State commitment to reducing losses from hazards. States may demonstrate this commitment by describing how they have successfully implemented programs or projects that have reduced their exposure to hazards and how they will build on these past successes. Each State's mitigation strategy may include, but is not limited to, any of those elements mentioned above. Other actions that go "above and beyond" the requirements of the Standard Plan will be considered. If a State has no previous experience with mitigation initiatives, then the plan may only contain the various elements that the State proposes to implement. In either case, States *should* provide a timeframe for implementing these initiatives.

If the documentation to satisfy this plan requirement is not included in its own section of the plan, the plan review crosswalk accompanying the plan *should* identify where in the plan these various commitments are described.

Plan Update: The plan update process includes the review of those mitigation-related initiatives identified in the previously approved plan. The update **must** demonstrate progress in implementing a comprehensive state mitigation program. Any additional mitigation initiatives that have been developed and/or implemented in the intervening period **must** be described in the updated plan.

Special Considerations: Although the Rule requirements do not specifically mention the development of a statewide risk assessment as a means to facilitate better coordination and detail in local mitigation planning, carrying out such an activity is a good way to meet this particular requirement.

Resource: For information on implementing a hazard mitigation program, see:

- ✓ *Bringing the Plan to Life* (FEMA 386-4), Step 2.

For ideas and examples of mitigation programs, policies, and projects, see:

- ✓ *Developing the Mitigation Plan* (FEMA 386-3), Steps 1 and 2.

Examples:

N/S

Original Submittal:

The State has developed a program by which it provides hazard mitigation training workshops for local governments. The State advertises the availability of the program through a brochure mailing that details the procedures for requesting the workshop.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.5(b)(4)(i-vi)		▪ The description of providing assistance is very brief; it does not include such details as the duration of the workshops, the staff or agencies providing training, or sources of funding.

Required Revisions:

The plan must document in detail the process by which the State implements its hazard mitigation programs and initiatives. If the program has been in place for some time, the plan should provide details about the results or performance of the program.

N S

Revised Submittal:

The State has developed a program by which it provides hazard mitigation

training workshops for local governments. The State advertises the availability of the program through a brochure mailing that details the procedures for requesting the workshop. **After a local government requests the training workshop, the State coordinates the logistical details with the local government for holding the workshop.**

The following State HMC representatives have been trained and authorized to conduct training for local governments on hazard mitigation planning:

- **The State Hazard Mitigation Officer, State Office of Emergency Preparedness**
- **The Hazard Reduction Policy Coordinator, State Smart Growth Office**
- **The Environmental Stewardship Officer, State Division of Environmental Protection**

Funding for the two-day workshop is provided through the State Hazard Mitigation Assistance Initiative (HMAI) and local funds. Each County government receives up to $1,500 to arrange the location, audio/visual equipment, invitations to interested staff and other local interested parties, and food. Any shortfall is made up through local funds. Since the training workshop program's initiation in 1999, five workshops have been conducted, and each of these localities has submitted a compliant hazard mitigation plan within one year of the workshop, as required.

PART 4 – PLAN REVIEW CROSSWALKS

This section contains blank Plan Review Crosswalks for Standard State Hazard Mitigation Plans, Enhanced State Hazard Mitigation Plans, and Local Hazard Mitigation Plans. Plan writers and reviewers working on Standard State Hazard Mitigation Plans will need the Standard State Hazard Mitigation Plan Review Crosswalk. An Enhanced State Plan requires the Review Crosswalk for the Standard State Plan **and** the Enhanced State Hazard Mitigation Plan Review Crosswalk. Those working on Local Mitigation Plans will use the Local Hazard Mitigation Plan Review Crosswalk.

Each section of the Plan Review Crosswalk is introduced by language from the Rule, stating the plan requirements. The first column, headed "**Element**," breaks down the requirements into their individual provisions, rephrasing them as questions. The second column, headed "**Location in the Plan**," is for indicating where in the plan the element is addressed. The third column, headed "**Reviewer's Comments**," is for indicating whether or not the plan has addressed the requirement satisfactorily and any recommended required improvements.

Except for prerequisites, which are scored as "Not Met" or "Met," the reviewer will score each element as an N for "Needs Improvement" or S for "Satisfactory," checking off the appropriate box under "**Score.**" Any element that receives an N will result in an N summary score for the requirement as a whole. At the end of the plan review, reviewers can fill out the Plan Summary Worksheet to easily present the results on one page.

For ease of use or expanding the space available for comments, these crosswalks can be downloaded off the FEMA Mitigation Planning Web site.

(THIS PAGE IS INTENTIONALLY BLANK)

Instructions for Using the Plan Review Crosswalk for Review of Standard State Hazard Mitigation Plans

Attached is a Plan Review Crosswalk based on the ***Multi-Hazard Mitigation Planning Guidance Under the Disaster Mitigation Act of 2000***, published by FEMA, with revisions dated November 2006. This Plan Review Crosswalk is consistent with the *Disaster Mitigation Act of 2000* (P.L. 106-390), enacted October 30, 2000 and *44 CFR Part 201 – Mitigation Planning, Interim Final Rule* (the Rule), published February 26, 2002.

SCORING SYSTEM

N – Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

S – Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Each requirement includes separate elements. All elements of a requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a summary score of "Satisfactory." A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing.

Optional matrices for assisting in the review of sections on profiling hazards and assessing vulnerability are found at the end of the Plan Review Crosswalk.

The example below illustrates how to fill in the Plan Review Crosswalk.

Example

Assessing Vulnerability by Jurisdiction

Requirement §201.4(c)(2)(ii): *[The State risk assessment **shall** include an] overview and analysis of the State's vulnerability to the hazards described in this paragraph (c)(2), based on estimates provided in local risk assessments … . The State **shall** describe vulnerability in terms of the jurisdictions most threatened by the identified hazards, and most vulnerable to damage and loss associated with hazard event.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the plan describe the State's vulnerability based on information from the local risk assessments?	Section III, pp. 12-28	The plan includes a description of local vulnerable structures. The plan presented a vulnerability summary by regions in the state. This information was collected from the approved plans on file.		✓
B. Does the plan present information on those jurisdictions that face the most risk?	Section III, pp. 30-36	The vulnerability description did not indicate which jurisdictions were the most vulnerable. **Required Revisions:** • Use the information provided in the summaries to determine which jurisdictions are most threatened by the identified hazards. • Identify which jurisdictions have suffered or are likely to suffer the most losses. • If data are not readily available, note these data limitations in the plan. Include actions in the mitigation strategy to obtain these data for the plan update.	✓	
		SUMMARY SCORE	✓	

Standard State Hazard Mitigation Plan Review and Approval Status

State Point of Contact:	**Address:**
Title:	
Agency:	
Phone Number:	**E-Mail:**

FEMA Reviewer:	**Title:**	**Date:**
Date Received in FEMA Region [Insert #]		
Plan Not Approved		
Plan Approved		
Date Approved		

State: Date of Plan:

STANDARD STATE HAZARD MITIGATION PLAN SUMMARY CROSSWALK

The plan cannot be approved if the plan has not been formally adopted.

Each requirement includes separate elements. All elements of the requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a score of "Satisfactory." Elements of each requirement are listed on the following pages of the Plan Review Crosswalk. A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing. Reviewer's comments must be provided for requirements receiving a **"Needs Improvement"** score.

SCORING SYSTEM

Please check one of the following for each requirement.

N – Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

S – Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Prerequisite	NOT MET	MET
Adoption by the State: §201.4(c)(6) and §201.4(c)(7)		

Planning Process	N	S
Documentation of the Planning Process: §201.4(c)(1)		
Coordination Among Agencies: §201.4(b)		
Program Integration: §201.4(b)		

Risk Assessment	N	S
Identifying Hazards: §201.4(c)(2)(i)		
Profiling Hazards: §201.4(c)(2)(i)		
Assessing Vulnerability by Jurisdiction: §201.4(c)(2)(ii)		
Assessing Vulnerability of State Facilities: §201.4(c)(2)(ii)		
Estimating Potential Losses by Jurisdiction: §201.4(c)(2)(iii)		
Estimating Potential Losses of State Facilities: §201.4(c)(2)(iii)		

Mitigation Strategy	N	S
Hazard Mitigation Goals: §201.4(c)(3)(i)		
State Capability Assessment: §201.4(c)(3)(ii)		
Local Capability Assessment: §201.4(c)(3)(ii)		
Mitigation Actions: §201.4(c)(3)(iii)		
Funding Sources: §201.4(c)(3)(iv)		

Coordination of Local Mitigation Planning	N	S
Local Funding and Technical Assistance: §201.4(c)(4)(i)		
Local Plan Integration: §201.4(c)(4)(ii)		
Prioritizing Local Assistance: §201.4(c)(4)(iii)		

Severe Repetitive Loss Mitigation Strategy *(only required for 90/10 under FMA & SRL)*	N	S
Repetitive Loss Mitigation Strategy: §201.4(c)(3)(v)		
Coordination with Repetitive Loss Jurisdictions §201.4(c)(3)(v)		

Plan Maintenance Process	N	S
Monitoring, Evaluating, and Updating the Plan: §201.4(c)(5)(i)		
Monitoring Progress of Mitigation Activities: §201.4(c)(5)(ii) and (iii)		

STANDARD STATE HAZARD MITIGATION PLAN APPROVAL STATUS

PLAN NOT APPROVED	
PLAN APPROVED	

See Reviewer's Comments

State: Date of Plan:

PREREQUISITE

Adoption by the State

Requirement §201.4(c)(6): *The plan* ***must*** *be formally adopted by the State prior to submittal to [FEMA] for final review and approval.*

Requirement §201.4(c)(7): *The plan* ***must*** *include assurances that the State will comply with all applicable Federal statutes and regulations in effect with respect to the periods for which it receives grant funding, in compliance with 44 CFR 13.11(c). The State will amend its plan whenever necessary to reflect changes in State or Federal laws and statutes as required in 44 CFR 13.11(d).*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE NOT MET	SCORE MET
A. Has the State formally adopted the **new or updated** plan?				
B. Does the plan provide assurances that the State will **continue to** comply with all applicable Federal statutes and regulations during the periods for which it receives grant funding, in compliance with 44 CFR 13.11(c), and will amend its plan whenever necessary to reflect changes in State or Federal laws and statutes as required in 44 CFR 13.11(d)?				
		SUMMARY SCORE		

PLANNING PROCESS: *§201.4(b): An effective planning process is essential in developing and maintaining a good plan.*

Documentation of the Planning Process

Requirement §201.4(c)(1): *[The State plan* ***must*** *include a] description of the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how other agencies participated.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the plan provide a narrative description of how the **new or updated** plan was prepared?				
B. Does the **new or updated** plan indicate who was involved in the **current** planning process?				
C. Does the **new or updated** plan indicate how other agencies participated in the **current** planning process?				
D. Does the updated plan document how the planning team reviewed and analyzed each section of the plan?				
E. Does the updated plan indicate for each section whether or not it was revised as part of the update process?				
		SUMMARY SCORE		

Coordination Among Agencies

Requirement §201.4(b): *The [State] mitigation planning process* ***should*** *include coordination with other State agencies, appropriate Federal agencies, interested groups, and … .*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan describe how Federal and State agencies were involved in the **current** planning process?		***Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.***		
B. Does the **new or updated** plan describe how interested groups (e.g., businesses, non-profit organizations, and other interested parties) were involved in the **current** planning process?		***Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.***		
C. Does the updated plan discuss how coordination among Federal and State agencies changed since approval of the previous plan?				
		SUMMARY SCORE		

Program Integration

Requirement §201.4(b): *[The State mitigation planning process* ***should****] be integrated to the extent possible with other ongoing State planning efforts as well as other FEMA mitigation programs and initiatives.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan describe how the State mitigation planning process is integrated with other ongoing State planning efforts?		***Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.***		
B. Does the **new or updated** plan describe how the State mitigation planning process is integrated with FEMA mitigation programs and initiatives?		***Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.***		
		SUMMARY SCORE		

RISK ASSESSMENT: *§201.4(c)(2): [The State plan must include a risk assessment] that provides the factual basis for activities proposed in the strategy portion of the mitigation plan. Statewide risk assessments must characterize and analyze natural hazards and risks to provide a statewide overview. This overview will allow the State to compare potential losses throughout the State and to determine their priorities for implementing mitigation measures under the strategy, and to prioritize jurisdictions for receiving technical and financial support in developing more detailed local risk and vulnerability assessments.*

Identifying Hazards

Requirement §201.4(c)(2)(i): *[The State risk assessment **shall** include an] overview of the type … of all natural hazards that can affect the State … .*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan provide a description of the type of **all natural hazards** that can affect the State? If the hazard identification omits (without explanation) any hazards commonly recognized as threats to the State, this part of the plan cannot receive a Satisfactory score.				
		SUMMARY SCORE		

Profiling Hazards

Requirement §201.4(c)(2)(i): *[The State risk assessment **shall** include an overview of the] location of all natural hazards that can affect the State, including information on previous occurrences of hazard events, as well as the probability of future hazard events, using maps where appropriate … .*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the risk assessment identify the **location** (i.e., geographic area affected) of each natural hazards addressed in the **new or updated** plan?				
B. Does the **new or updated** plan provide information on **previous occurrences** of each hazard addressed in the plan?				
C. Does the **new or updated** plan include the **probability of future events** (i.e., chance of occurrence) for each hazard addressed in the plan?				
		SUMMARY SCORE		

Assessing Vulnerability

Requirement §201.4(c)(2)(ii): *[The State risk assessment **shall** include an] overview and analysis of the State's vulnerability to the hazards described in this paragraph (c)(2), based on estimates provided in local risk assessments as well as the State risk assessment. The State **shall** describe vulnerability in terms of the jurisdictions most threatened by the identified hazards, and most vulnerable to damage and loss associated with hazard events. State owned critical or operated facilities located in the identified hazard areas shall also be addressed … .*

Requirement §201.4(d): Plan must be reviewed and revised to reflect changes in development…

Assessing Vulnerability by Jurisdiction

Element	Location in the **Plan** (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan describe the State's vulnerability based on estimates provided in local risk assessments as well as the State risk assessment?				
B. Does the **new or updated** plan describe the State's vulnerability in terms of the jurisdictions most threatened and most vulnerable to damage and loss associated with hazard event(s)?				
C. Does the updated plan explain the process used to analyze the information from the local risk assessments, as necessary?				
D. Does the updated plan reflect changes in development for jurisdictions in hazard prone areas?				
		SUMMARY SCORE		

Assessing Vulnerability of State Facilities

Element	Location in the **Plan** (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan describe the types of State owned or operated critical facilities located in the identified hazard areas?				
		SUMMARY SCORE		

Estimating Potential Losses

Requirement §201.4(c)(2)(iii): *[The State risk assessment **shall** include an] overview and analysis of potential losses to the identified vulnerable structures, based on estimates provided in local risk assessments as well as the State risk assessment. The State **shall** estimate the potential dollar losses to State owned or operated buildings, infrastructure, and critical facilities located in the identified hazard areas.*

Requirement §201.4(d): Plan must be reviewed and revised to reflect changes in development…

Estimating Potential Losses by Jurisdiction

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan present an overview and analysis of the potential losses to the identified vulnerable structures?				
B. Are the potential losses based on estimates provided in local risk assessments as well as the State risk assessment?				
C. Does the updated plan reflect the effects of changes in development on loss estimates?				
		SUMMARY SCORE		

Estimating Potential Losses of State Facilities

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan present an estimate of the potential dollar losses to State owned or operated buildings, infrastructure, and critical facilities in the identified hazard areas?				
		SUMMARY SCORE		

MITIGATION STRATEGY: *§201.4(c)(3) [To be effective the plan must include a] Mitigation Strategy that provides the State's blueprint for reducing the losses identified in the risk assessment.*

Hazard Mitigation Goals

Requirement §201.4(c)(3)(i): *[The State mitigation strategy **shall** include a] description of State goals to guide the selection of activities to mitigate and reduce potential losses.*

Requirement §201.4(d): Plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities…

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan provide a description of State mitigation **goals** that guide the selection of mitigation activities?				
B. Does the updated plan demonstrate that the goals were assessed and either remain valid or have been revised?				
		SUMMARY SCORE		

State Capability Assessment ***Requirement §201.4(c)(3)(ii):*** *[The State mitigation strategy **shall** include a] discussion of the State's pre-and post-disaster hazard management policies, programs, and capabilities to mitigate the hazards in the area, including: an evaluation of State laws, regulations, policies, and programs related to hazard mitigation as well as to development in hazard-prone areas [and] a discussion of State funding capabilities for hazard mitigation projects … .*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan include an evaluation of the State's **pre-disaster** hazard management policies, programs, and capabilities?				
B. Does the **new or updated** plan include an evaluation of the State's **post-disaster** hazard management policies, programs, and capabilities?				
C. Does the **new or updated** plan include an evaluation of the State's policies related to **development in hazard prone areas**?				
D. Does the **new or updated** plan include a discussion of State **funding capabilities** for hazard mitigation projects?				
E. Does the updated plan address any hazard management capabilities of the State that have changed since approval of the previous plan?				

SUMMARY SCORE		

Local Capability Assessment

Requirement §201.4(c)(3)(ii): *[The State mitigation strategy **shall** include] a general description and analysis of the effectiveness of local mitigation policies, programs, and capabilities.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan present a general description of the local mitigation policies, programs, and capabilities?				
B. Does the **new or updated** plan provide a general analysis of the effectiveness of local mitigation policies, programs, and capabilities?				
		SUMMARY SCORE		

Mitigation Actions

Requirement §201.4(c)(3)(iii): *[State plans **shall** include an] identification, evaluation, and prioritization of cost-effective, environmentally sound, and technically feasible mitigation actions and activities the State is considering and an explanation of how each activity contributes to the overall mitigation strategy. This section **should** be linked to local plans, where specific local actions and projects are identified.*

Requirement §201.4(d): Plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities…

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan identify cost-effective, environmentally sound, and technically feasible mitigation actions and activities the State is considering?				
B. Does the **new or updated** plan evaluate these actions and activities?				
C. Does the **new or updated** plan prioritize these actions and activities?				
D. Does the **new or updated** plan explain how each activity contributes to the overall State mitigation strategy?				
E. Does the mitigation strategy **in the new or updated** section reflect actions and projects identified in local plans?		***Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.***		
		SUMMARY SCORE		

Funding Sources

Requirement §201.4(c)(3)(iv): *[The State mitigation strategy **shall** include an] identification of current and potential sources of Federal, State, local, or private funding to implement mitigation activities.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan identify **current** sources of Federal, State, local, or private funding to implement mitigation activities?				
B. Does the **new or updated** plan identify **potential** sources of Federal, State, local, or private funding to implement mitigation activities?				
C. Does the updated plan identify the sources of mitigation funding used to implement activities in the mitigation strategy since approval of the previous plan?				
		SUMMARY SCORE		

COORDINATION OF LOCAL MITIGATION PLANNING

Local Funding and Technical Assistance

Requirement §201.4(c)(4)(i): *[The section on the Coordination of Local Mitigation Planning **must** include a] description of the State process to support, through funding and technical assistance, the development of local mitigation plans.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan provide a description of the State process to support, through funding and technical assistance, the development of local mitigation plans?				
B. Does the updated plan describe the funding and technical assistance the State has provided in the past three years to assist local jurisdictions in completing approvable mitigation plans?				
		SUMMARY SCORE		

Local Plan Integration

Requirement §201.4(c)(4)(ii): *[The section on the Coordination of Local Mitigation Planning* ***must*** *include a] description of the State process and timeframe by which the local plans will be reviewed, coordinated, and linked to the State Mitigation Plan.*

Requirement §201.4(d): Plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities…

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan provide a description of the **process and timeframe** the State established to **review** local plans?				
B. Does the **new or updated** plan provide a description of the **process and timeframe** the State established to **coordinate and link** local plans to the State Mitigation Plan?				
		SUMMARY SCORE		

Prioritizing Local Assistance

Requirement §201.4(c)(4)(iii): *[The section on the Coordination of Local Mitigation Planning **must** include] criteria for prioritizing communities and local jurisdictions that would receive planning and project grants under available funding programs, which **should** include consideration for communities with the highest risks, repetitive loss properties, and most intense development pressures.*

*Further, that for non-planning grants, a principal criterion for prioritizing grants **shall** be the extent to which benefits are maximized according to a cost benefit review of proposed projects and their associated costs.*

Requirement §201.4(d): Plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities…

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan provide a description of the criteria for prioritizing those communities and local jurisdictions that would receive planning and project grants under available mitigation funding programs?				
B. **For the new or updated plan, do** the prioritization criteria include, for non-planning grants, the consideration of the extent to which benefits are maximized according to a cost benefit review of proposed projects and their associated cost?				
C. **For the new or updated plan, do** the criteria include considerations for communities with the highest risk?		***Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.***		
D. **For the new or updated plan, do** the criteria include considerations for repetitive loss properties?		***Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.***		
E. **For the new or updated plan, do** the criteria include considerations for communities with the most intense development pressures?		***Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.***		
		SUMMARY SCORE		

PLAN MAINTENANCE PROCESS

Monitoring, Evaluating, and Updating the Plan ***Requirement §201.4(c)(5)(i):*** *[The Standard State Plan Maintenance Process **must** include an] established method and schedule for monitoring, evaluating, and updating the plan.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan describe the method and schedule for monitoring the plan? (e.g., identifies the party responsible for **monitoring**, includes schedule for reports, site visits, phone calls, and/or meetings)				
B. Does the **new or updated** plan describe the method and schedule for **evaluating** the plan? (e.g., identifies the party responsible for evaluating the plan, includes the criteria used to evaluate the plan)				
C. Does the **new or updated** plan describe the method and schedule for **updating** the plan?				
D. Does the updated plan include an analysis of whether the previously approved plan's method and schedule worked, and what elements or processes, if any, were changed?				
		SUMMARY SCORE		

Monitoring Progress of Mitigation Activities ***Requirement §201.4(c)(5)(ii):*** *[The Standard State Plan Maintenance Process **must** include a] system for monitoring implementation of mitigation measures and project closeouts.* Requirement ***§201.4(c)(5)(iii):*** *[The Standard State Plan Maintenance Process **must** include a] system for reviewing progress on achieving goals as well as activities and projects in the Mitigation Strategy.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** plan describe how mitigation measures and project closeouts will be monitored?				
B. Does the **new or updated** plan identify a system for reviewing progress on achieving goals in the Mitigation Strategy?				
C. Does the updated plan describe any modifications, if any, to the system identified in the previously approved plan to track the initiation, status, and completion of mitigation activities?				
D. Does the **new or updated** plan identify a system for reviewing progress on implementing activities and projects of the Mitigation Strategy?				
E. Does the updated plan discuss if mitigation actions were implemented as planned?		***Note: Related to §201.4 (c)(3)(iii)***		
		SUMMARY SCORE		

SEVERE REPETITIVE LOSS STRATEGY *(only required for 90/10 under FMA & SRL)*

Repetitive Loss Mitigation Strategy

Requirement §201.4(c)(3)(v): *A State may request the reduced cost share authorized under §79.4(c)(2) of this chapter for the FMA and SRL programs, if it has an approved State Mitigation Plan … that also identifies specific actions the State has taken to reduce the number of repetitive loss properties (which* ***must*** *include severe repetitive loss properties), and specifies how the State intends to reduce the number of such repetitive loss properties.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE NOT MET	SCORE MET
A. Does the new or updated plan describe State mitigation goals that support the selection of mitigation activities for repetitive loss properties (see also Part 201.4(c)(3)(i))?		***[Note: Only required for SRL 90/10 under FMA & SRL]***		
B. Does the new or updated plan consider repetitive loss properties in its evaluation of the State's hazard management policies, programs, and capabilities and its general description of the local mitigation capabilities (see also Part 201.4(c)(3)(ii))?		***[Note: Only required for SRL 90/10 under FMA & SRL]***		
C. Does the new or updated plan address repetitive loss properties in its risk assessment (see also Part 201.4(c)(2))?		***[Note: Only required for SRL 90/10 under FMA & SRL]***		
D. Does the new or updated plan identify, evaluate and prioritize cost-effective, environmentally sound, and technically feasible mitigation actions for repetitive loss properties (see also Part 201.4(c)(3)(iii))?		***[Note: Only required for SRL 90/10 under FMA & SRL]***		
E. Does the new or updated plan describe specific actions that have been implemented to mitigate repetitive loss properties, including actions taken to reduce the number of severe repetitive loss properties?		***[Note: Only required for SRL 90/10 under FMA & SRL]***		
F. Does the new or updated plan identify current and potential sources of Federal, State, local, or private funding to implement mitigation activities for repetitive loss properties (see also Part 201.4(c)(3)(iv))?		***[Note: Only required for SRL 90/10 under FMA & SRL]***		
		SUMMARY SCORE		

Coordination with Repetitive Loss Jurisdictions

Requirement §201.4(c)(3(v): *In addition, the plan* ***must*** *describe the strategy the State has to ensure that local jurisdictions with severe repetitive loss properties take actions to reduce the number of these properties, including the development of local mitigation plans.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the new or updated plan provide a description of the State process to support, through funding and technical assistance, the development of local mitigation plans in communities with severe repetitive loss properties (see also Part 201.4(c)(4)(i))?		***[Note: Only required for SRL 90/10 under FMA & SRL]***		
B. Does the new or updated plan include considerations for repetitive loss properties in its criteria for prioritizing communities and local jurisdictions that would receive planning and project grants under available mitigation funding programs (see also Part 201.4(c)(3)(iii))?		***[Note: Only required for SRL 90/10 under FMA & SRL]***		
		SUMMARY SCORE		

Matrix A: Profiling Hazards

This matrix can assist FEMA in scoring each hazard. States may find the matrix useful to ensure that their plan addresses each natural hazard that can affect the State. **Completing the matrix is not required.**

Note: First, check which hazards are identified in requirement §201.4(c)(2)(i). Then, place a checkmark in either the N or S box for each ***applicable*** *hazard. An "N" for any element of any identified hazard will result in a "Needs Improvement" score for this requirement. List the hazard and its related shortcoming in the comments section of the Plan Review Crosswalk.*

Hazard Type	Hazards Identified Per Requirement §201.4(c)(2)(i)	A. Location		B. Previous Occurrences		C. Probability of Future Events	
	Yes	N	S	N	S	N	S
Avalanche	☐	☐	☐	☐	☐	☐	☐
Coastal Erosion	☐	☐	☐	☐	☐	☐	☐
Coastal Storm	☐	☐	☐	☐	☐	☐	☐
Dam Failure	☐	☐	☐	☐	☐	☐	☐
Drought	☐	☐	☐	☐	☐	☐	☐
Earthquake	☐	☐	☐	☐	☐	☐	☐
Expansive Soils	☐	☐	☐	☐	☐	☐	☐
Extreme Heat	☐	☐	☐	☐	☐	☐	☐
Flood	☐	☐	☐	☐	☐	☐	☐
Hailstorm	☐	☐	☐	☐	☐	☐	☐
Hurricane	☐	☐	☐	☐	☐	☐	☐
Land Subsidence	☐	☐	☐	☐	☐	☐	☐
Landslide	☐	☐	☐	☐	☐	☐	☐
Levee Failure	☐	☐	☐	☐	☐	☐	☐
Severe Winter Storm	☐	☐	☐	☐	☐	☐	☐
Tornado	☐	☐	☐	☐	☐	☐	☐
Tsunami	☐	☐	☐	☐	☐	☐	☐
Volcano	☐	☐	☐	☐	☐	☐	☐
Wildfire	☐	☐	☐	☐	☐	☐	☐
Windstorm	☐	☐	☐	☐	☐	☐	☐
Other _____	☐	☐	☐	☐	☐	☐	☐
Other _____	☐	☐	☐	☐	☐	☐	☐
Other _____	☐	☐	☐	☐	☐	☐	☐

To check boxes, double click on the box and change the default value to "checked."

Legend:
§201.4(c)(2)(i) Profiling Hazards
A. Does the risk assessment identify the location (i.e., geographic area affected) of each natural hazard addressed in the **new or updated** plan?
B. Does the plan provide information on previous occurrences of each hazard addressed in the **new or updated** plan?
C. Does the plan include the probability of future events (i.e., chance of occurrence) for each hazard addressed in the **new or updated** plan?

Matrix B: Assessing Vulnerability

This matrix can assist FEMA in scoring each hazard. States may find the matrix useful to ensure that their plan addresses each requirement. Note that this matrix only includes items for Requirements §201.4(c)(2)(ii) and §201.4(c)(2)(iii) that are related to specific natural hazards that can affect the State. **Completing the matrix is not required**.

Note: First, check which hazards are identified in requirement §201.4(c)(2)(i). Then, place a checkmark in either the N or S box for each ***applicable*** *hazard. An "N" for any element of any identified hazard will result in a "Needs Improvement" score for this requirement. List the hazard and its related shortcoming in the comments section of the Plan Review Crosswalk.*

Hazard Type	Hazards Identified Per Requirement §201.4(c)(2)(i)	§201.4(c)(2)(ii) Assessing Vulnerability					§201.4(c)(2)(iii) Estimating Potential Losses				
		1. Vulnerability by Jurisdiction		2. Vulnerability to State Facilities			3. Loss Estimate by Jurisdiction		4. Loss Estimate of State Facilities		
	Yes	N	S	N	S		N	S	N	S	
Avalanche	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Coastal Erosion	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Coastal Storm	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Dam Failure	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Drought	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Earthquake	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Expansive Soils	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Extreme Heat	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Flood	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Hailstorm	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Hurricane	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Land Subsidence	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Landslide	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Levee Failure	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Severe Winter Storm	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Tornado	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Tsunami	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Volcano	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Wildfire	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Windstorm	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Other _____	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Other _____	☐	☐	☐	☐	☐		☐	☐	☐	☐	
Other _____	☐	☐	☐	☐	☐		☐	☐	☐	☐	

To check boxes, double click on the box and change the default value to "checked."

Legend

§201.4(c)(2)(ii) Assessing Vulnerability by Jurisdiction (see element B)

1. Does the **new or updated** plan describe the State's vulnerability in terms of the jurisdictions most threatened and most vulnerable to damage and loss associated with hazard event(s)?

§201.4(c)(2)(ii) Assessing Vulnerability to State Facilities (see element A)

2. Does the **new or updated** plan describe the types of State owned or operated critical facilities located in the identified hazard areas?

§201.4(c)(2)(iii) Estimating Potential Losses by Jurisdiction (see element A)

3. Does the **new or updated** plan present an overview and analysis of the potential losses to the identified vulnerable structures?

§201.4(c)(2)(iii) Estimating Potential Losses of State Facilities (see element A)

4. Does the **new or updated** plan present an estimate of the potential dollar losses to State owned or operated buildings, infrastructure, and critical facilities in the identified hazard areas?

Instructions for Using the Attached Plan Review Crosswalk for Review of Enhanced State Hazard Mitigation Plans

Attached is a Plan Review Crosswalk based on the ***Multi-Hazard Mitigation Planning Guidance Under the Disaster Mitigation Act of 2000***, published by FEMA, dated March 2004, and revised June 2007. This Plan Review Crosswalk is consistent with the *Disaster Mitigation Act of 2000* (P.L. 106-390), enacted October 30, 2000 and *44 CFR Part 201 – Mitigation Planning* (the Rule).

SCORING SYSTEM

N – Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

S – Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Each requirement includes separate elements. All elements of a requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a summary score of "Satisfactory."

The example below illustrates how to fill in the Plan Review Crosswalk.

Example

6. Effective Use of Available Mitigation Funding

Requirement §201.5(b)(3): *[The Enhanced Plan **must** demonstrate] that the State effectively uses existing mitigation programs to achieve its mitigation goals.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the new or updated Enhanced Plan document how the State has made full use of funding available from FEMA mitigation grant programs, and if the State has not made full use of this funding, does the plan explain the reasons why?	Section VI, pp. 2-3	The plan contains information that the State has not made full use of funding from FEMA grant programs, without explaining why this is the case. **Required Revision:** • Discuss why all available funding from FEMA grant programs was not used.	✓	
		SUMMARY SCORE	✓	

Enhanced State Hazard Mitigation Plan Review and Approval Status

State Point of Contact:	**Address:**
Title:	
Agency:	
Phone Number:	**E-Mail:**

FEMA Reviewer:	**Title:**	**Date:**
Date Received in FEMA Region [insert #]		
Plan Not Approved		
Plan Approved		
Date Approved		

State: Date of Plan:

STANDARD STATE HAZARD MITIGATION PLAN SUMMARY CROSSWALK

The plan cannot be approved if the plan has not been formally adopted.

Each requirement includes separate elements. All elements of the requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a score of "Satisfactory." Elements of each requirement are listed on the following pages of the Plan Review Crosswalk. Reviewer's comments must be provided for requirements receiving a **"Needs Improvement"** score.

SCORING SYSTEM
Please check one of the following for each requirement:
N – Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

S – Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Prerequisite	**NOT MET**	**MET**
1. Compliance with Standard State Plan Requirements: §201.5(b)		

Comprehensive State Hazard Mitigation Planning Program	**N**	**S**
2. Integration with Other Planning Initiatives: §201.5(b)(1)		
3. Project Implementation Capability: §201.5(b)(2)(i) and (ii)		
4. Program Management Capability: §201.5(b)(2)(iii A-D)		
5. Assessment of Mitigation Actions: §201.5(b)(2)(iv)		
6. Effective Use of Available Mitigation Funding: §201.5(b)(3)		
7. Commitment to a Comprehensive Mitigation Program: §201.5(b)(4)(i-vi)		

ENHANCED STATE HAZARD MITIGATION PLAN APPROVAL STATUS

PLAN NOT APPROVED ☐

PLAN APPROVED ☐

See Reviewer's Comments

PREREQUISITE

1. Compliance with Standard State Plan Requirements

Requirement §201.5(b): *Enhanced State Mitigation Plans **must** include all elements of the Standard State Mitigation Plan identified in §201.4 … .*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Does the **new or updated** Enhanced Plan meet all the Standard State Mitigation Plan requirements?				
		SUMMARY SCORE		

COMPREHENSIVE STATE HAZARD MITIGATION PLANNING PROGRAM

2. Integration with Other Planning Initiatives

Requirement §201.5(b)(1): *[An Enhanced Plan **must** demonstrate] that the plan is integrated to the extent practicable with other State and/or regional planning initiatives (comprehensive, growth management, economic development, capital improvement, land development, and/or emergency management plans) and FEMA mitigation programs and initiatives that provide guidance to State and regional agencies.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the **new or updated** Enhanced Plan demonstrate how it is integrated to the extent practicable with other State and regional planning initiatives (comprehensive, growth management, economic development, capital improvement, land development, and/or emergency management plans)?				
B. Does the **new or updated** Enhanced Plan demonstrate how it has been integrated to the extent practicable with FEMA mitigation programs and initiatives that provide guidance to State and regional agencies?				
		SUMMARY SCORE		

3. Project Implementation Capability

Requirement §201.5(b)(2)(i) and (ii): *[The Enhanced Plan **must** document] the State's project implementation capability, identifying and demonstrating the ability to implement the plan, including:*

- *Established eligibility criteria for multi-hazard mitigation measures.*
- *A system to determine the cost effectiveness of mitigation measures, consistent with OMB Circular A-94, Guidelines and Discount Rates for Benefit-Cost Analysis of Federal Programs, and*
- *[A system] to rank the measures according to the State's eligibility criteria.*

Element	**Location in the Plan** (section or annex and page #)	**Reviewer's Comments**	**SCORE**	
			N	**S**
A. Does the **new or updated** Enhanced Plan demonstrate that the State has established eligibility criteria for multi-hazard mitigation measures? **Does the updated Plan describe changes, if any, to those criteria?**				
B. Does the **new or updated** Enhanced Plan describe the State's system for determining the cost effectiveness of mitigation measures, consistent with OMB Circular A-94? **Does the updated Plan describe changes, if any, to this system?**				
C. Does the **new or updated** Enhanced Plan describe the State's system to rank the measures according to the State's eligibility criteria, **including a process to prioritize projects between jurisdictions and between proposals that address different or multiple hazards**?				
		SUMMARY SCORE		

4. Program Management Capability

Requirement §201.5(b)(2)(iii A-D): *[The Enhanced Plan **must** demonstrate] that the State has the capability to effectively manage the HMGP as well as other mitigation grant programs, [and provide] a record of the following:*

- *Meeting HMGP and other mitigation grant application timeframes and submitting complete, technically feasible, and eligible project applications with appropriate supporting documentation;*
- *Preparing and submitting accurate environmental reviews and benefit-cost analyses;*
- *Submitting complete and accurate quarterly progress and financial reports on time; and*
- *Completing HMGP and other mitigation grant projects within established performance periods, including financial reconciliation.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** Enhanced Plan describe the State's capability to effectively manage the HMGP as well as other mitigation grant programs?		***[See Regional Certification to Determine Score]***		
B. Does the **new or updated** Enhanced Plan provide a record for meeting HMGP and other mitigation grant application timeframes and submitting complete, technically feasible, and eligible project applications with appropriate supporting documentation?		***[See Regional Certification to Determine Score]***		
C. Does the **new or updated** Enhanced Plan provide a record for preparing and submitting accurate environmental reviews and benefit-cost analyses?		***[See Regional Certification to Determine Score]***		
D. Does the **new or updated** Enhanced Plan provide a record for submitting complete and accurate quarterly progress and financial reports on time?		***[See Regional Certification to Determine Score]***		
E. Does the **new or updated** Enhanced Plan provide a record for completing HMGP and other mitigation grant projects within established performance periods, including financial reconciliation?		***[See Regional Certification to Determine Score]***		
SUMMARY SCORE				

5. Assessment of Mitigation Actions

Requirement §201.5(b)(2)(iv): *[The Enhanced Plan **must** document the] system and strategy by which the State will conduct an assessment of the completed mitigation actions and include a record of the effectiveness (actual cost avoidance) of each mitigation action.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the **new or updated** Enhanced Plan describe the system and strategy by which the State will conduct an assessment of the completed mitigation actions?				
B. Does the **new or updated** Enhanced Plan include the record of the effectiveness (i.e., actual cost avoidance) of each mitigation actions, **including how the assessment was completed?**				
		SUMMARY SCORE		

6. Effective Use of Available Mitigation Funding

Requirement §201.5(b)(3): *[The Enhanced Plan **must** demonstrate] that the State effectively uses existing mitigation programs to achieve its mitigation goals.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE N	SCORE S
A. Does the new or updated Enhanced Plan document how the State has made full use of funding available from FEMA mitigation grant programs, and if the State has not made full use of this funding, does the plan explain the reasons why?				
B. Does the **new or updated** Enhanced Plan document how the State is effectively using existing programs to achieve its mitigation goals?				
		SUMMARY SCORE		

7. Commitment to a Comprehensive Mitigation Program

Requirement §201.5(b)(4)(i-vi): *[The Enhanced Plan **must** demonstrate] that the State is committed to a comprehensive state mitigation program, which might include any of the following:*

- *A commitment to support local mitigation planning by providing workshops and training, State planning grants, or coordinated capability development of local officials, including Emergency Management and Floodplain Management certifications.*
- *A Statewide program of hazard mitigation through the development of legislative initiatives, mitigation councils, formation of public/private partnerships, and/or other executive actions that promote hazard mitigation.*
- *The State provides a portion of the non-Federal match for HMGP and/or other mitigation projects.*
- *To the extent allowed by State Law, the State requires or encourages local governments to use a current version of a nationally applicable model building code or standard that addresses natural hazards as a basis for design and construction of State sponsored mitigation projects.*
- *A comprehensive, multi-year plan to mitigate the risks posed to the existing buildings that have been identified as necessary for post-disaster response and recovery operations.*
- *A comprehensive description of how the State integrates mitigation into its post-disaster recovery operations.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the **new or updated** Enhanced Plan demonstrate that the State is committed to a comprehensive State mitigation program?				
B. Does the updated Enhanced Plan demonstrate progress in implementing a comprehensive State mitigation program, including new mitigation initiatives developed or implemented by the State?				
		SUMMARY SCORE		