

LOCAL MITIGATION PLAN REVIEW TOOL +HHPD

The *Local Mitigation Plan Review Tool* demonstrates how the Local Mitigation Plan meets the regulation in 44 CFR §201.6 and offers States and FEMA Mitigation Planners an opportunity to provide feedback to the community.

- The Regulation Checklist provides a summary of FEMA’s evaluation of whether the Plan has addressed all requirements.
- The Plan Assessment identifies the plan’s strengths as well as documents areas for future improvement.
- The Multi-jurisdiction Summary Sheet is an optional worksheet that can be used to document how each jurisdiction met the requirements of each Element of the Plan (Planning Process; Hazard Identification and Risk Assessment; Mitigation Strategy; Plan Review, Evaluation, and Implementation; and Plan Adoption).

The FEMA Mitigation Planner must reference this *Local Mitigation Plan Review Guide* when completing the *Local Mitigation Plan Review Tool*.

Jurisdiction: City of Saint Paul	Title of Plan: 2022 City of Saint Paul, AK Local Hazard Mitigation Plan Update	Date of Plan: September 2022
Local Point of Contact: Philip Zavadil	Address:	
Title: City Manager		
Agency: City of Saint Paul		
Phone Number: 907-341-3994	E-Mail: pazavadil@stpaulak.com	

State Reviewer: Erin M. Leaders	Title: EMS II/Planner	Date: 1 st Review 07/27/2022 2 nd Review 09/22/2022
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FEMA Reviewer: Danielle Curtis John McCandless	Title: CERC Planner FEMA Mitigation Planner	Date: 9/8/2022 9/16/2022
Date Received in FEMA Region 10	8/9/2022	
Plan Not Approved		
Plan Approvable Pending Adoption	9/26/2022	
Plan Approved		

**SECTION 1:
REGULATION CHECKLIST**

INSTRUCTIONS: The Regulation Checklist must be completed by FEMA. The purpose of the Checklist is to identify the location of relevant or applicable content in the Plan by Element/sub-element and to determine if each requirement has been ‘Met’ or ‘Not Met.’ The ‘Required Revisions’ summary at the bottom of each Element must be completed by FEMA to provide a clear explanation of the revisions that are required for plan approval. Required revisions must be explained for each plan sub-element that is ‘Not Met.’ Sub-elements should be referenced in each summary by using the appropriate numbers (A1, B3, etc.), where applicable. Requirements for each Element and sub-element are described in detail in this *Plan Review Guide* in Section 4, Regulation Checklist.

1. REGULATION CHECKLIST		Location in Plan (section and/or	Met	Not Met
Regulation (44 CFR § 201.6 Local Mitigation Plans)				
ELEMENT A. PLANNING PROCESS				
A1. Does the Plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction? (Requirement §201.6(c)(1))	Sec 2.1/pp. 2-1 –2-2 (PDF 10-11)	X		
A2. Does the Plan document an opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, agencies that have the authority to regulate development as well as other interests to be involved in the planning process? (Requirement §201.6(b)(2))	Sec 2.2/pp. 2-2–2-3 (PDF 11-12), PDF p. 66 (Appendix C)	X		
A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))	Sec. 2.1/pp. 2-1 (PDF 10), Sec 2.3/pp. 2-3 (PDF p. 12)	X		
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))	Sec 2.4/pp. 2-3 –2-4 (PDF 12-13)	X		
A5. Is there discussion of how the community(ies) will continue public participation in the plan maintenance process? (Requirement §201.6(c)(4)(iii))	Sec 2.5/pp. 2-4 (PDF 13)	X		
A6. Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a 5-year cycle)? (Requirement §201.6(c)(4)(i))	Sec 2.6/pp. 2-4 –2-5 (PDF 13-14)	X		
ELEMENT A: REQUIRED REVISIONS				

ELEMENT B. HAZARD IDENTIFICATION AND RISK ASSESSMENT			
B1. Does the Plan include a description of the type, location, and extent of all natural hazards that can affect each jurisdiction(s)? (Requirement §201.6(c)(2)(i))	pp.3-2 – 3-16	X	
B2. Does the Plan include information on previous occurrences of hazard events and on the probability of future hazard events for each jurisdiction? (Requirement §201.6(c)(2)(i))	pp.3-2 – 3-16	X	
B3. Is there a description of each identified hazard’s impact on the community as well as an overall summary of the community’s vulnerability for each jurisdiction? (Requirement §201.6(c)(2)(ii))	Sec 4.1/pp. 4-1 –4-4 (PDF 31-34) Sec 4.2/ pp. 4-4 –4-6 (PDF 34-36)	X	
B4. Does the Plan address NFIP insured structures within the jurisdiction that have been repetitively damaged by floods? (Requirement §201.6(c)(2)(ii))	Sec 4.3/pp. 4-6 (PDF p. 36)	X	
ELEMENT B: REQUIRED REVISIONS			
ELEMENT C. MITIGATION STRATEGY			
C1. Does the plan document each jurisdiction’s existing authorities, policies, programs and resources and its ability to expand on and improve these existing policies and programs? (Requirement §201.6(c)(3))	Sec 5.1/pp. 5-1 –5-6 (PDF 37-42)	X	
C2. Does the Plan address each jurisdiction’s participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement §201.6(c)(3)(ii))	Sec 5.2/pp. 5-6 (PDF 42)	X	
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))	Sec 5.3/pp. 5-6 (PDF 42)	X	
C4. Does the Plan identify and analyze a comprehensive range of specific mitigation actions and projects for each jurisdiction being considered to reduce the effects of hazards, with emphasis on new and existing buildings and infrastructure? (Requirement §201.6(c)(3)(ii))	Sec 5.4/pp. 5-6 –5-9 (PDF 42-45)	X	
C5. Does the Plan contain an action plan that describes how the actions identified will be prioritized (including cost benefit review), implemented, and administered by each jurisdiction? (Requirement §201.6(c)(3)(iv)); (Requirement §201.6(c)(3)(iii))	Sec 5.4/pp. 5-6 –5-9 (PDF 42-45) Sec 5.5/pp. 5-10 –5-12 (PDF 46-48), Sec. 6.3/pp. 6-2 (PDF p. 51)	X	
C6. Does the Plan describe a process by which local governments will integrate the requirements of the mitigation plan into other planning mechanisms, such as comprehensive or capital improvement plans, when appropriate? (Requirement §201.6(c)(4)(ii))	Sec 5.6/pp. 5-12 –5-13 (PDF 48-49)	X	

ELEMENT C: REQUIRED REVISIONS

AECOM Response: Table 5-6 (Recommended Mitigation Actions) has been expanded to include a list of benefit-cost considerations for each mitigation action that were taken into account during the prioritization process.

FEMA concurs, Element met. JNA 9/26/2022.

ELEMENT D. PLAN REVIEW, EVALUATION, AND IMPLEMENTATION (applicable to plan updates only)

D1. Was the plan revised to reflect changes in development? (Requirement §201.6(d)(3))	Sec 6.1/pp. 6-1 (PDF 50)	X	
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))	Sec 6.2/pp. 6-1 –6-2 (PDF 50-51)	X	
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))	Sec 5.5/pp. 5-10 –5-12 (PDF 46-48), Sec. 6.3/pp. 6-2 (PDF 51)	X	

ELEMENT D: REQUIRED REVISIONS**ELEMENT E. PLAN ADOPTION**

E1. Does the Plan include documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval? (Requirement §201.6(c)(5))	Sec 7.1/pp. 7-1 (PDF 52)		X
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))	NA		

ELEMENT E: REQUIRED REVISIONS**ALL DAM RISKS - HIGH HAZARD POTENTIAL DAMS****HHPD1. Did the plan describe the incorporation of existing plans, studies, reports and technical information for HHPDs?**

HHPD1-a. Does the plan describe how the local government worked with local dam owners and/or the state dam safety agency?	NA		
HHPD1-b. Does the plan incorporate information shared by the state and/or local dam owners?	NA		

HHPD2. Did the plan address HHPDs in the risk assessment?

HHPD2-a. Does the plan describe the risks and vulnerabilities to and from HHPDs?	NA		
HHPD2-b. Does the plan document the limitations and describe how to address deficiencies?	NA		

HHPD3. Did the plan include mitigation goals to reduce long-term vulnerabilities from HHPDs?

HHPD3-a. Does the plan address how to reduce vulnerabilities to and from HHPDs as part of its own goals or with other long-term strategies?	NA		
HHPD3-b. Does the plan link proposed actions to reducing long-term vulnerabilities that are consistent with its goals?	NA		
HHPD4. Did the plan include actions that address HHPDs and prioritize mitigation actions to reduce vulnerabilities from HHPDs?			
HHPD4-a. Does the plan describe specific actions to address HHPDs?	NA		
HHPD4-b. Does the plan describe the criteria used to prioritize actions related to HHPDs?	NA		
HHPD4-c. Does the plan identify the position, office, department or agency responsible for implementing and administering the action to mitigate hazards to or from HHPDs?	NA		
<u>HHPD Required Revisions</u>			
ELEMENT F. ADDITIONAL STATE REQUIREMENTS (OPTIONAL FOR STATE REVIEWERS ONLY; NOT TO BE COMPLETED BY FEMA)			
F1.			
F2.			
<u>ELEMENT F: REQUIRED REVISIONS</u>			

SECTION 2: PLAN ASSESSMENT

INSTRUCTIONS: The purpose of the Plan Assessment is to offer the local community more comprehensive feedback to the community on the quality and utility of the plan in a narrative format. The audience for the Plan Assessment is not only the plan developer/local community planner, but also elected officials, local departments and agencies, and others involved in implementing the Local Mitigation Plan. The Plan Assessment must be completed by FEMA. The Assessment is an opportunity for FEMA to provide feedback and information to the community on: 1) suggested improvements to the Plan; 2) specific sections in the Plan where the community has gone above and beyond minimum requirements; 3) recommendations for plan implementation; and 4) ongoing partnership(s) and information on other FEMA programs, specifically Risk MAP and Hazard Mitigation Assistance programs. The Plan Assessment is divided into two sections:

1. Plan Strengths and Opportunities for Improvement
2. Resources for Implementing Your Approved Plan

Plan Strengths and Opportunities for Improvement is organized according to the plan Elements listed in the Regulation Checklist. Each Element includes a series of italicized bulleted items that are suggested topics for consideration while evaluating plans, but it is not intended to be a comprehensive list. FEMA Mitigation Planners are not required to answer each bullet item and should use them as a guide to paraphrase their own written assessment (2-3 sentences) of each Element.

The Plan Assessment must not reiterate the required revisions from the Regulation Checklist or be regulatory in nature and should be open-ended and to provide the community with suggestions for improvements or recommended revisions. The recommended revisions are suggestions for improvement and are not required to be made for the Plan to meet Federal regulatory requirements. The italicized text should be deleted once FEMA has added comments regarding strengths of the plan and potential improvements for future plan revisions. It is recommended that the Plan Assessment be a short synopsis of the overall strengths and weaknesses of the Plan (no longer than two pages), rather than a complete recap section by section.

Resources for Implementing Your Approved Plan provides a place for FEMA to offer information, data sources and general suggestions on the plan implementation and maintenance process. Information on other possible sources of assistance including, but not limited to, existing publications, grant funding or training opportunities, can be provided. States may add state and local resources, if available.

A. Plan Strengths and Opportunities for Improvement

This section provides a discussion of the strengths of the plan document and identifies areas where these could be improved beyond minimum requirements.

Element A: Planning Process

Plan Strengths:

- There is a clear timeline of the planning process and a record of planning team contributions.
- Multiple communication and engagement platforms were used. They included email, website and a newsletter.

Opportunities for Improvement:

- Consider alternative ways to engage the public and solicit more feedback in the future.

Element B: Hazard Identification and Risk Assessment

Plan Strengths:

- There is an organized risk assessment table for each hazard.
- There is strong consideration of climate change impacts and vulnerabilities.

Opportunities for Improvement:

- Include more figures to communicate risk to the public such as tables, charts, maps and photos.
- Identify any data gaps that can be filled as new data become available. This task can be incorporated into the plan review and evaluation process.

Element C: Mitigation Strategy

Plan Strengths:

- The plan addresses opportunity. It also addresses ability to expand on resources and capabilities.
- There is a diversity of mitigation actions and types. These stress a relationship to new and existing development.

Opportunities for Improvement:

- Include estimated project costs in mitigation action discussion and prioritization. This will help discuss feasibility and potential funding sources.

Element D: Plan Update, Evaluation, and Implementation (*Plan Updates Only*)

Plan Strengths:

- The plan describes changes in development that may affect community vulnerability. Assessing future conditions supports a long-term vision for resilience.

Opportunities for Improvement:

- Consider potential challenges to executing the plan and how to address them. This may include local capabilities, geography, or if other resources are available. This will help proactively monitor the mitigation strategy and evaluate its effectiveness.

B. Resources for Implementing Your Approved Plan

Ideas may be offered on moving the mitigation plan forward and continuing the relationship with key mitigation stakeholders such as the following:

- *What FEMA assistance (funding) programs are available (for example, Hazard Mitigation Assistance (HMA)) to the jurisdiction(s) to assist with implementing the mitigation actions?*
- *What other Federal programs (National Flood Insurance Program (NFIP), Community Rating System (CRS), Risk MAP, etc.) may provide assistance for mitigation activities?*
- *What publications, technical guidance or other resources are available to the jurisdiction(s) relevant to the identified mitigation actions?*
- *Are there upcoming trainings/workshops (Benefit-Cost Analysis (BCA), HMA, etc.) to assist the jurisdictions(s)?*
- *What mitigation actions can be funded by other Federal agencies (for example, U.S. Forest Service, National Oceanic and Atmospheric Administration (NOAA), Environmental Protection Agency (EPA) Smart Growth, Housing and Urban Development (HUD) Sustainable Communities, etc.) and/or state and local agencies?*

FEMA's 2022-2026 FEMA Strategic Plan

FEMA's 2022-2026 FEMA Strategic Plan outlines a bold vision and three ambitious goals designed to address key challenges the agency faces during a pivotal moment in the field of emergency management.

Goal 1: Instill equity as a foundation of emergency management

Goal 2: Lead whole of community in climate resilience

Goal 3: Promote and sustain a ready FEMA and prepared nation

2022-2026 FEMA Strategic Plan

https://www.fema.gov/sites/default/files/documents/fema_2022-2026-strategic-plan.pdf

Training

The FEMA Emergency Management Institute Mitigation Curriculum provides training for Federal, State, local, and tribal governments that are working to eliminate or reduce the long-term risk to human life and property posed by earthquakes, floods, tornadoes, dam failures, landslides, hurricanes, and other natural hazards.

FEMA Emergency Management Institute Mitigation Curriculum

<https://training.fema.gov/is/searchisbycurriculum.aspx?keywords=mitigation>

Funding

The Resource List for the BRIC Grant Program provides a list of resources and information on key elements of the Building Resilient Infrastructure and Communities (BRIC) program.

Resource List for the BRIC Grant Program

<https://www.fema.gov/grants/mitigation/building-resilient-infrastructure-communities/resources>

The Region 10 Mitigation Funding Opportunity Guides provide state, tribes, and local officials with a wide range of application development resources for hazard mitigation grants.

Region 10 Mitigation Funding Opportunity Guides

<https://www.fema.gov/about/organization/region-10/mitigation-funding-opportunity-guides>

The Planning Related Activities Using Hazard Mitigation Planning Grant Program 7-Percent Funding

factsheet provides information on Planning related activities from the Hazard Mitigation Grant Program (HMGP) . State, Tribal, and/or local governments may use planning-related funding to reduce risk and include hazard mitigation with planning. Take a look at this guide for information on what types of mitigation activities may help you implement your projects.

Planning Related Activities Using Hazard Mitigation Planning Grant Program 7-Percent Funding

<https://www.fema.gov/node/planning-related-activities-using-hazard-mitigation-planning-grant-program-7-percent-funding>

Rehabilitation of High Hazard Potential Dams (HHPD) provides technical, planning, design, and construction assistance in the form of grants for rehabilitation of eligible high hazard potential dams. High Hazard Potential is a classification standard for any dam whose failure or mis-operation will cause loss of human life and significant property destruction.

Rehabilitation Of High Hazard Potential Dam (HHPD) Grant Program

<https://www.fema.gov/emergency-managers/risk-management/dam-safety/rehabilitation-high-hazard-potential-dams>

Your mitigation strategy may include eligible projects to be funded through FEMA’s hazard mitigation grant programs (BRIC, Hazard Mitigation Grant Program, Flood Mitigation Assistance). Contact your State Hazard Mitigation Officer, Terry Murphy, at terry.murphy@alaska.gov, for more information.

Plan Integration

The Region 10 Coffee Break Webinar on Integrating Natural Hazard Mitigation into Comprehensive Planning is a resource specific to Region 10 states and provides examples of how communities are integrating natural hazard mitigation strategies into comprehensive planning.

Integrating Natural Hazard Mitigation Plans into Local Planning - YouTube (#11 in the series)

<https://www.youtube.com/watch?v=6LBSCe48oZw>

The whole series includes 12 webinars focused in Mitigation planning.

Natural Hazards Mitigation Planning Coffee Break Series - YouTube

<https://www.youtube.com/playlist?list=PLayUpGk-iyXUJpJtYfIC5aFUqi2jkdBCm>

Plan Integration: Linking Local Planning Efforts is a step-by-step guide to help communities review local plans for possible integration and improve alignment efforts, including interagency coordination.

Plan Integration: Linking Local Planning Efforts

https://www.fema.gov/sites/default/files/2020-06/fema-plan-integration_7-1-2015.pdf

The Mitigation Planning and Community Rating System Bulletin provides an overview of how to bring together planning efforts between the Community Rating System and hazard mitigation plans.

Mitigation Planning and the Community Rating System: Key Topics Bulletin

https://www.fema.gov/sites/default/files/2020-06/fema-mitigation-planning-and-the-community-rating-system-key-topics-bulletin_10-1-2018.pdf

Climate Mapping for Resilience and Adaptation (CMRA) integrates information from across the federal government to help people consider their local exposure to climate-related hazards. People working in community organizations or for local, Tribal, state, or Federal governments can use the site to help them develop equitable climate resilience plans to protect people, property, and infrastructure. The site also points users to Federal grant funds for climate resilience projects, including those available through the Bipartisan Infrastructure Law.

Climate Mapping for Resilience and Adaptation

<https://resilience.climate.gov/>

Mitigation Ideas/Best Practice

The Region 10 Seismic Mitigation Showcase Guides highlight mitigation successes in earthquake and tsunami mitigation by documenting specific locations and communities, the decision-making process, path to funding, and how partnerships were developed.

Region 10 Seismic Mitigation Showcase Guides

<https://www.fema.gov/about/organization/region-10/seismic-mitigation-showcase-guides>

The Mitigation Ideas: A Resource for Reducing Risk from Natural Hazards resource presents ideas for how to mitigate the impacts of different natural hazards, from drought and sea level rise, to severe winter weather and wildfire. The document also includes ideas for actions that communities can take to reduce risk to multiple hazards, such as incorporating a hazard risk assessment into the local development review process.

Mitigation Ideas

https://www.fema.gov/sites/default/files/2020-06/fema-mitigation-ideas_02-13-2013.pdf

The Local Mitigation Planning Handbook provides guidance to local governments on developing or updating hazard mitigation plans to meet and go above the requirements.

Local Mitigation Planning Handbook

https://www.fema.gov/sites/default/files/2020-06/fema-local-mitigation-planning-handbook_03-2013.pdf

The FEMA Region 10 Risk Mapping, Analysis, and Planning program (Risk MAP) releases a monthly newsletter that includes information about upcoming events and training opportunities, as well as hazard and risk related news from around the Region. If you would like to receive future newsletters, email rxnewsletter@starr-team.com and ask to be included. Past newsletters can be viewed at <https://starr-team.com/starr/RegionalWorkspaces/RegionX/Pages/default.aspx>.

Planning for Post-Disaster Redevelopment includes guidance on how to integrate risk reduction strategies into existing local plans, policies, codes, and programs for community development or redevelopment patterns.

Planning for Post-Disaster Redevelopment

<https://www.fema.gov/sites/default/files/2020-07/post-disaster-redevelopment-planning.pdf>

The National Fire Adapted Communities Learning Network exists to support and connect people and communities working on wildfire resilience. It offers community-based leaders resources, tools and connections to reduce their wildfire risk and increase community resilience.

National Fire Adapted Communities Learning Network

<https://fireadaptednetwork.org/about/>