

LOCAL MITIGATION PLAN REVIEW TOOL

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 the 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: Juniata County	Title of Plan: Juniata County 2020 Hazard Mitigation Plan	Date of Plan:
Local Point of Contact:	Address:	
Title:		
Agency:		
Phone Number:		
	E-Mail:	

State Reviewer: Ernie Szabo	Title: State Planner	Date:
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FEMA Reviewer: Matt McCullough	Title: Community Planner	Date:
Date Received in FEMA Region <i>(insert #)</i>		
Plan Not Approved		
Plan Approvable Pending Adoption	X	
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 page number)	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))	Pg. 16-23 Appendix C	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))	Pg. 16-23 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))	Pg. 20-23 Appendix C	X	
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))	Appendix A	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))	Pg. 222	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))	Pg. 221	X	

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
<u>ELEMENT A: REQUIRED REVISIONS</u>				
A1.) Required Revision:				
Pg. 23 Please provide the responses (Capability Assessment Survey, Risk Assessment Hazard Identification and Risk Evaluation Worksheet & Hazard Mitigation Opportunity Form Review and Updates) from communities referenced on pg. 23.				
Please also provide minutes for meetings noted in Appendix C.				
Provided Appendix information.				
A4.) Required Revision:				
Appendix A- please include a narrative describing how the reference materials in Appendix A were incorporated into the plan.				
Will include.				
Narrative provided.				
A6.) Recommended Revision:				
Pg. 221 Please provide specific criteria for the evaluation components (HIRA, Capabilities & Mitigation Strategies)				
Evaluation components provided.				
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))	Section 4 Appendix D	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))	Section 4 Appendix D	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))	Section 4	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))	Pg. 59 & 60, Table 21	X		

1. REGULATION CHECKLIST

Regulation (44 CFR 201.6 Local Mitigation Plans)

Location in Plan
(section and/or
page number)

Met

Not
Met

ELEMENT B: REQUIRED REVISIONS

Note/Discussion:

Pg. 120- Extremely interesting "HIRA" written on Emergency Services. Although not a natural hazard, a very informative description of a risk to Juniata County. A conversation on the analysis approach could be very beneficial, as it applies to other capabilities in Section 5. Mitigation Strategy conversation- pg. 203
May include an outreach campaign strategy to address.

B3.) Discussion:

The HAZUS run performed for the previous Juniata HMP identified Total Building-related losses at 53.32M. It also noted that Expected Damage to Essential Facilities would be registered At Least Moderate for 1 Fire Station and 1 School, with the Loss of Use for 1 School. The HAZUS run performed for the 2020 Juniata HMP identified Total Building-related losses at 51.41M. It also noted that there were no Expected Damage to Essential Facilities. Could you please discuss what components were updated in the HAZUS database which resulted in the risk and dollar loss estimate decrease?

Mapping & frequency intervals have been the same since the previous HAZUS run. 10/2/12.

The 2020 HAZUS results seem to differ with Table 24 on pg. 61, as well as the mapping provided in Appendix D. When the addressed structures are reviewed on the map service center, some of these buildings are in the 1% annual chance area.

Discussion points will be considered for the next plan update.

Discussion:

How was digital floodplain mapping used to engage, on a risk-based discussion, with the participating municipalities? Maps are provided in Appendix D but there is no description as to how flood risk was discussed during the planning meetings using these available tools.

Example: Pg. 61 Table 24- Flood Vulnerable Critical Facilities. Several of these structures are squarely in the Special Flood Hazard Area. As uniquely identified at-risk structures in the Risk Assessment, these could be prioritized, using the National Flood Hazard Layer and Local Knowledge, to further advance the conversation on prioritization and solutions.

Please see comment for Element C4.) below to connect this conversation to the Mitigation Strategies.

Discussion points will be considered for the next plan update.

ELEMENT C. MITIGATION STRATEGY

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
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))	Pg. 173-185	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))	Pg. 56-60	X		
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))	Pg. 203-204	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))	Pg. 208-220	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))	Pg. 208-220	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))	Pg. 186-191	X		

ELEMENT C: REQUIRED REVISIONS

C2.) Required Revision:

Pg. 56 Please provide perspective, for each community, on how local officials provide access to floodplain mapping and flood insurance information to citizens, as well as enforcement of the local floodplain ordinance. Please see attached NFIP Survey to assist with these topics.

Will send out the NFIP Survey to communities.

Awaiting the NFIP Surveys.

Have include community NFIP Surveys.

C4.) Required Revision:

Pg. 207- There are only two natural hazards uniquely identified in the Table 70 (Flooding & Radon). Using Table 69 as the reference, please provide more distinct associations with specific hazard types for the actions in Table 70. Example- Table 69 says that Radon Exposure has a specific Mitigation Technique for Structural and Infrastructure. Which action is this? The previous plan spelled out each hazard under the given action.

Association to multiple hazards has been established. Additionally, specific projects have been provided for hazards within the Opportunity Forms.

C4.) Recommended Revision/Discussion:

Pg. 208 states that “the municipalities were informed that they needed to have at least one hazard-related mitigation action for their municipality.” This is not quite accurate. Municipalities need to have actions that are consistent with the Hazard Identification & Risk Assessment (HIRA). The HIRA indicates that each municipality is at-risk to more than one hazard. This should result in multiple specific actions for each community.

This has been adjusted.

C4.) Discussion:

Pg. 196: 2015 Juniata HMP- Action 1.5.1 states that the County will “Conduct a thorough critical facilities vulnerability assessment and impact analysis using the HMP’s GIS-based critical infrastructure history.” This action is maintained under Action 1.2.1.

The hazard mitigation plan is the prime opportunity to conduct a vulnerability assessment of these facilities. The planning process is the time to identify the correct personnel to assist with this activity. As noted as a Capability in Section 5 and at a minimum, reaching out to County GIS for specific locations and their relationship with the established hazards areas could provide a basis for this analysis. Also, if facility replacement costs or a value similar could be documented, there would be an opportunity to begin comparing potential risk and potential loss.

Discussion points will be considered for the next plan update.

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
C4.) Discussion: Continuation from Discussion under Element B: Development of specific solutions based on the engagement of risk products with communities. Appendix G provides specific Project Opportunities. How were these generated during the planning process? Could this section have been more robust if mapping and risk products were used more directly to engage the participating communities? Discussion points will be considered for the next plan update.				
C5.) Required Revision: Pg. 208-220- Affiliations made between municipalities and actions must be made clearer. Example: Action 2.1.1 – on pg. 211 the Responsibility is noted as being Juniata County EMA/Planning but on pg. 218 each community has this checked off as applying to them. A clear delineation needs to be made to the responsible party at the municipal level. Another example is Action 1.2.1 (pg. 209 & 217). Will include update to 2.1.1 & include language to further identify a local champion- office, department, title, position, etc..... Language has been included. For the next plan update, developing a questionnaire or engagement strategy to more clearly identify the local champion for each applicable jurisdiction, per action is suggested.				
C6.) Kudos: Nice write-up on plan integration. Good examples of specific component incorporations.				
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))	Pg. 12-14, 171-172	X		
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))	Pg. 195-202	X		
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))	Pg. 192-194	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))	N/A			
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))	N/A			

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
<u>ELEMENT E: 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 RiskMAP 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 overall 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

How does the Plan go above and beyond minimum requirements to document the planning process with respect to:

- *Involvement of stakeholders (elected officials/decision makers, plan implementers, business owners, academic institutions, utility companies, water/sanitation districts, etc.);*
- *Involvement of Planning, Emergency Management, Public Works Departments or other planning agencies (i.e., regional planning councils);*
- *Diverse methods of participation (meetings, surveys, online, etc.); and*
- *Reflective of an open and inclusive public involvement process.*

Element B: Hazard Identification and Risk Assessment

In addition to the requirements listed in the Regulation Checklist, 44 CFR 201.6 Local Mitigation Plans identifies additional elements that should be included as part of a plan's risk assessment. The plan should describe vulnerability in terms of:

- 1) *A general description of land uses and future development trends within the community so that mitigation options can be considered in future land use decisions;*
- 2) *The types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard areas; and*
- 3) *A description of potential dollar losses to vulnerable structures, and a description of the methodology used to prepare the estimate.*

How does the Plan go above and beyond minimum requirements to document the Hazard Identification and Risk Assessment with respect to:

- *Use of best available data (flood maps, HAZUS, flood studies) to describe significant hazards;*
- *Communication of risk on people, property, and infrastructure to the public (through tables, charts, maps, photos, etc.);*
- *Incorporation of techniques and methodologies to estimate dollar losses to vulnerable structures;*
- *Incorporation of Risk MAP products (i.e., depth grids, Flood Risk Report, Changes Since Last FIRM, Areas of Mitigation Interest, etc.); and*
- *Identification of any data gaps that can be filled as new data became available.*

Element C: Mitigation Strategy

How does the Plan go above and beyond minimum requirements to document the Mitigation Strategy with respect to:

- *Key problems identified in, and linkages to, the vulnerability assessment;*
- *Serving as a blueprint for reducing potential losses identified in the Hazard Identification and Risk Assessment;*
- *Plan content flow from the risk assessment (problem identification) to goal setting to mitigation action development;*
- *An understanding of mitigation principles (diversity of actions that include structural projects, preventative measures, outreach activities, property protection measures, post-disaster actions, etc);*
- *Specific mitigation actions for each participating jurisdictions that reflects their unique risks and capabilities;*
- *Integration of mitigation actions with existing local authorities, policies, programs, and resources; and*
- *Discussion of existing programs (including the NFIP), plans, and policies that could be used to implement mitigation, as well as document past projects.*

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

How does the Plan go above and beyond minimum requirements to document the 5-year Evaluation and Implementation measures with respect to:

- *Status of previously recommended mitigation actions;*
- *Identification of barriers or obstacles to successful implementation or completion of mitigation actions, along with possible solutions for overcoming risk;*
- *Documentation of annual reviews and committee involvement;*
- *Identification of a lead person to take ownership of, and champion the Plan;*
- *Reducing risks from natural hazards and serving as a guide for decisions makers as they commit resources to reducing the effects of natural hazards;*
- *An approach to evaluating future conditions (i.e. socio-economic, environmental, demographic, change in built environment etc.);*
- *Discussion of how changing conditions and opportunities could impact community resilience in the long term; and*
- *Discussion of how the mitigation goals and actions support the long-term community vision for increased resilience.*

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?*

SECTION 3:
MULTI-JURISDICTION SUMMARY SHEET (OPTIONAL)

INSTRUCTIONS: For multi-jurisdictional plans, a Multi-jurisdiction Summary Spreadsheet may be completed by listing each participating jurisdiction, which required Elements for each jurisdiction were ‘Met’ or ‘Not Met,’ and when the adoption resolutions were received. This Summary Sheet does not imply that a mini-plan be developed for each jurisdiction; it should be used as an optional worksheet to ensure that each jurisdiction participating in the Plan has been documented and has met the requirements for those Elements (A through E).

MULTI-JURISDICTION SUMMARY SHEET												
#	Jurisdiction Name	Jurisdiction Type (city/borough/ township/ village, etc.)	Plan POC	Mailing Address	Email	Phone	Requirements Met (Y/N)					
							A. Planning Process	B. Hazard Identification & Risk Assessment	C. Mitigation Strategy	D. Plan Review, Evaluation & Implementation	E. Plan Adoption	F. State Requirements
1	Beale Township											
2	Delaware Township											
3	Fayette Township											
4	Fermanagh Township											
5	Greenwood Township											
6	Lack Township											
7	Mifflin Borough											
8	Mifflintown Borough											
9	Milford Township											

MULTI-JURISDICTION SUMMARY SHEET

#	Jurisdiction Name	Jurisdiction Type (city/borough/ township/ village, etc.)	Plan POC	Mailing Address	Email	Phone	Requirements Met (Y/N)					
							A. Planning Process	B. Hazard Identification & Risk Assessment	C. Mitigation Strategy	D. Plan Review, Evaluation & Implementation	E. Plan Adoption	F. State Requirements
10	Monroe Township											
11	Port Royal Borough											
12	Spruce Hill Township											
13	Susquehanna Township											
14	Thompsonston Borough											
15	Turbett Township											
16	Tuscarora Township											
17	Walker Township											
18												
19												
20												

