

Federal Emergency Management Agency Local Mitigation Plan Review Guide and the Community Resilience Building Process

Summary: The following is a cross-walk between FEMA's Local Mitigation Plan Review Guide and the Community Resilience Building Process. The intent is to clearly identify where and how the Community Resilience Building Process can satisfy specific Elements of the Regulatory Checklist.

Overview: To help assist Federal and State officials assess and ensure Local Mitigation Plans meet the Stafford Act and Title 44 Code of Federal Enforcement (CFR) §201.6.1 requirements in a fair, equitable, and consistent manner the Local Mitigation Plan Review Guide was developed (https://www.fema.gov/medialibrary-data/20130726-1809-25045-7498/plan review guide final 9 30 11.pdf). This "Review Guide" is FEMA's official source for interpreting and defining the statutory and regulatory requirements of Local Mitigation Plans. This "Review Guide" works in tandem with the Local Mitigation Planning Handbook so practitioners developing plans have a clear understanding of technical requirements and approaches to meet these requirements. Referencing the requirements stated in this Review Guide, practitioners developing Local Mitigation Plans can utilize the Community Resilience Building Workshop to ensure Local Plans go above and beyond minimum requirements for certain elements during the review process by Federal and State officials. The connections between Local Mitigation Plans and the Community Resilience Building Workshop begin with FEMA's Guiding Principles for mitigation planning: these include but are not limited to A) "Focus on Mitigation Strategy" B) "Process is as important as the Plan itself"; C) "This is a Community's Plan"; and D) "Foster Relationships". All of these Guiding Principles are directly in line with principles of Community Resilience Building that allows for the development of mitigation orientated actions for all hazards by broad, diverse stakeholders through a community-driven and community-owned process that ultimately strengthens relationships around risk and resilience at multiple scales. Community Resilience Building can specifically advantage the following select technical and approach regulatory elements of FEMA's Review Guide's Regulation Checklist.

Excerpts from FEMA's Local Mitigation Plan Review Tool (Appendix A – Local Mitigation Plan Review Guide) with cross-walk to Community Resilience Building (CRB) Workshop Steps and Tasks.

1. REGULATION CHECKLIST (Regulation (44 CFR §201.6.1 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))	CRB should be clearly documented as part of the planning process by preparers for each jurisdiction.	



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))	CRB helps to ensure a broad, stakeholder engagement that should include members of neighboring communities, local/regional hazard mitigation professionals, and agencies with authority over development. Refer to CRB Step A - Preparing for Workshop Task 2 – Engage stakeholders.	
A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))	CRB is ideally an early step while preparing a mitigation plan therefore providing for public involvement in the drafting stages. Refer to CRB Step A: Task 2; Step G – Moving Forward Task 1 – Continue community outreach and engagement.	
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))	CRB Step A Task 3 - Preparing materials for workshop can be used as an initial review of existing plans, studies, reports, and technical information for each jurisdiction addressed in the Plan. Additional documentation will likely be needed to satisfy this requirement fully.	
A5. Is there discussion of how the community(ies) will continue public participation in the plan maintenance process? (Requirement §201.6(c)(4)(iii))	Each jurisdiction addressed in the Plan will need to develop a process to continue public participation. Refer to CRB Step G Task 1.	
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))	Each jurisdiction addressed in the Plan will need to describe the method and schedule for monitoring, evaluating, and updating. CRB can be used to effectively update mitigation plans within a 5-year cycle.	
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))	CRB affords the community an opportunity to provide descriptions of all hazards via surveys, facilitated dialogue, and participatory mapping. Refer to Step A – Task 3 – Prepare materials for workshop (i.e., Community Characterization Survey); Step B – Characterize Hazards Task 1 – Identify past, current, and future impacts.	



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))	CRB Step B Task 1 provides an opportunity for the community(ies) to generate information on previous and future hazard events. Additional documentation and dialogue with community members will likely be needed to satisfy this requirement fully.	
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))	CRB Step B Task 1 and Task 2 - Determine the highest-priority hazards; Step C - Identify Community Vulnerabilities and Strengths provides initial descriptions of hazard impacts and an overall summary of vulnerabilities. Additional documentation will likely be needed to satisfy this requirement fully.	
B4. Does the Plan address the NFIP insured structures within the jurisdiction that have been repetitively damaged by floods? (Requirement §201.6(c)(2)(ii))	CRB Step B and Step C provide the community an opportunity to address NFIP insured structures within the jurisdiction. Additional documentation will likely be needed to satisfy this requirement fully.	
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))	CRB provides an initial opportunity to discuss existing and expanded/improved authorities, policies, programs, and resources through Step C and Step D - Identify and Prioritize Community Actions. Additional documentation will likely be needed to satisfy this requirement fully.	
C2. Does the Plan document each jurisdiction's participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement §201.6(c)(3)(ii)	Additional documentation will likely be needed to satisfy this requirement fully.	
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))	CRB requires the community to identify mitigation actions to reduce/avoid immediate and long-term vulnerabilities to identified hazards for infrastructural, societal, and environmental assets. Refer to Step C and Step D.	



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))	CRB requires the community to specifically focus on infrastructure-related mitigation to multiple hazards including new and existing buildings as required in a given community. Refer to Step C Task 1 – Identify infrastructural vulnerabilities and strengths; Step D Task 1 – Identify and prioritize infrastructural actions.	
C5. Does the Plan contain an action plan that describes how the actions identified will be prioritized, implemented, and administered by each jurisdiction? (Requirement §201.6(c)(3)(iii)) (Requirement §201.6(c)(3)(iv))	CRB provides the community with a comprehensive method to prioritize actions for infrastructural, societal, and environmental community components. Refer to Step D; Step E – Determine the Overall Priority Actions. Additional dialogue will likely be needed to satisfy this requirement fully.	
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))	CRB Step D, E - Determine the Overall Priority Actions; Step G - Move Forward - Task 3 - Inform existing planning and project activities are designed to provide local governments an opportunity to initially address integration of mitigation plan requirements. Additional documentation will likely be needed to satisfy this requirement fully.	
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)	Additional documentation will likely be needed to satisfy this requirement fully.	
D2. Was the Plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))	CRB affords the community to revisit outputs from earlier workshop(s) (i.e., CRB Summary of Findings, Risk Matrix) as they conduct additional workshop(s) during a revision process to determine progress over time (5-year cycle for CRB Workshop(s)).	
D3. Was the Plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))	CRB outputs (i.e., CRB Summary of Findings, Risk Matrix) provide a quick reference to changes in priorities over time – ideally as priority actions are taken to reduce risk from earlier priorities (5-year cycle for CRB Workshop(s))	



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))	Additional documentation will be needed to satisfy this requirement fully.	
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))	Additional documentation will be needed to satisfy this requirement fully.	