

APPENDIX K – FEMA PLAN CROSSWALK/CHECKLIST

The FEMA Plan Crosswalk/Regulation Checklist is a guide to help Plan reviewers with VDEM and FEMA locate required components of the Plan. The Crosswalk/Checklist is in this section.

Local Mitigation Plan Review Tool

Cover Page

The Local Mitigation Plan Review Tool (PRT) 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 local governments, including special districts.

1. The Multi-Jurisdictional Summary Sheet is a worksheet that is used to document how each jurisdiction met the requirements of the plan elements (Planning Process; Risk Assessment; Mitigation Strategy; Plan Maintenance; Plan Update; and Plan Adoption).
2. The Plan Review Checklist summarizes FEMA's evaluation of whether the plan has addressed all requirements.

For greater clarification of the elements in the Plan Review Checklist, please see Section 4 of this guide. Definitions of the terms and phrases used in the PRT can be found in Appendix E of this guide.

Plan Information	
Jurisdiction(s)	Commonwealth Regional Council (PDC 14)
Title of Plan	CRC Regional Hazard Mitigation Plan
New Plan or Update	Update
Single- or Multi-Jurisdiction	Multi-jurisdiction
Date of Plan	Click or tap to enter a date.
Local Point of Contact	
Title	Deputy Director
Agency	Commonwealth Regional Council
Address	P.O. Box P, Farmville, VA 23901
Phone Number	434-392-6104
Email	TFortune@virginiasheartland.org

Additional Point of Contact	
Title	Regional Planner
Agency	Commonwealth Regional Council
Address	P.O. Box P, Farmville, VA 23901
Phone Number	434-392-6104
Email	ljones@virginiashheartland.org

Review Information	
State Review	
State Reviewer(s) and Title	Amanda Weaver, VDEM Region 1, All Hazards Planner Peter Homan, VDEM Region 3, All Hazards Planner
State Review Date	6/22/2023
FEMA Review	
FEMA Reviewer(s) and Title	Mari Radford, Region 3, Community Planning Section Supervisor Rodney Bahner, VA FIT, Community Planner
Date Received in FEMA Region	1 st Submission: 7/10/23 2 nd Submission: 1/24/2024
Plan Not Approved	8/16/2023
Plan Approvable Pending Adoption	2/23/2024
Plan Approved	Click or tap to enter a date.

Multi-Jurisdictional Summary Sheet

In the boxes for each element, mark if the element is met (Y) or not met (N).

#	Jurisdiction Name	A. Planning Process	B. Risk Assessment	C. Mitigation Strategy	D. Plan Maintenance	E. Plan Update	F. Plan Adoption	G. HHPD Requirements	H. State Requirements
1	Amelia County	Y	Y	Y	Y	Y	Y	Y	
2	Buckingham County	Y	Y	Y	Y	Y	Y	Y	
3	Town of Dillwyn	Y	Y	Y	Y	Y	Y	Y	
4	Charlotte County	Y	Y	Y	Y	Y	Y	Y	
5	Town of Charlotte Court House	Y	Y	Y	Y	Y	Y	Y	
6	Town of Drakes Branch	Y	Y	Y	Y	Y	Y	Y	
7	Town of Keysville	Y	Y	Y	Y	Y	Y	Y	
8	Town of Phenix	Y	Y	Y	Y	Y	Y	Y	
9	Cumberland County	Y	Y	Y	Y	Y	Y	Y	
10	Lunenburg County	Y	Y	Y	Y	Y	Y	Y	
11	Town of Kenbridge	Y	Y	Y	Y	Y	Y	Y	
12	Town of Victoria	Y	Y	Y	Y	Y	Y	Y	
13	Nottoway County	Y	Y	Y	Y	Y	Y	Y	
14	Town of Blackstone	Y	Y	Y	Y	Y	Y	Y	
15	Town of Burkeville	Y	Y	Y	Y	Y	Y	Y	
16	Town of Crewe	Y	Y	Y	Y	Y	Y	Y	
17	Prince Edward County	Y	Y	Y	Y	Y	Y	Y	
18	Town of Farmville	Y	Y	Y	Y	Y	Y	Y	

Plan Review Checklist

The Plan Review Checklist is completed by FEMA. States and local governments are encouraged, but not required, to use the PRT as a checklist to ensure all requirements have been met prior to submitting the plan for review and approval. 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.” FEMA completes the “required revisions” summary at the bottom of each element to clearly explain the revisions that are required for plan approval. Required revisions must be explained for each plan sub-element that is “not met.” Sub-elements in each summary should be referenced using the appropriate numbers (A1, B3, etc.), where applicable. Requirements for each element and sub-element are described in detail in Section 4: Local Plan Requirements of this guide.

Plan updates must include information from the current planning process.

If some elements of the plan do not require an update, due to minimal or no changes between updates, the plan must document the reasons for that.

Multi-jurisdictional elements must cover information unique to all participating jurisdictions.

Element A: Planning Process

Element A Requirements	Location in Plan (section and/or page number)	Met / Not Met
A1. Does the plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction? (Requirement 44 CFR § 201.6(c)(1))		
A1-a. Does the plan document how the plan was prepared, including the schedule or time frame and activities that made up the plan’s development, as well as who was involved?	Section 2, pp. 6-14; Appendix J	Met
A1-b. Does the plan list the jurisdiction(s) participating in the plan that seek approval, and describe how they participated in the planning process?	Section 1, p. 4; Section 2, pp. 7-8	Met

Element A Requirements	Location in Plan (section and/or page number)	Met / Not Met
A2. Does the plan document an opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development as well as businesses, academia, and other private and non-profit interests to be involved in the planning process? (Requirement 44 CFR § 201.6(b)(2))		
A2-a. Does the plan identify all stakeholders involved or given an opportunity to be involved in the planning process, and how each stakeholder was presented with this opportunity?	Section 2, pp. 9-10	Met
A3. Does the plan document how the public was involved in the planning process during the drafting stage and prior to plan approval? (Requirement 44 CFR § 201.6(b)(1))		
A3-a. Does the plan document how the public was given the opportunity to be involved in the planning process and how their feedback was included in the plan?	Section 2, pp. 9-10; Appendix J	Met
A4. Does the plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement 44 CFR § 201.6(b)(3))		
A4-a. Does the plan document what existing plans, studies, reports and technical information were reviewed for the development of the plan, as well as how they were incorporated into the document?	Section 2, pp. 10-11; Footnotes throughout base plan & Appendices	Met
ELEMENT A REQUIRED REVISIONS		
<p>Required Revision:</p> <p>A2-a: See page 3 of this PRT: all communities are shown as NOT MET the planning phases. Is this a mistake?</p> <p>The plan must document how each of the five groups listed in Element A2, Section 4 of the 2022 local mitigation planning policy guide were invited to be a part of the planning process. The list of "local colleges and universities and local groups" contacted does not include representatives from community-based organizations that work directly with or support underserved and socially vulnerable communities. If representatives from an existing organization, such as the community hospital, fill this role, the plan can state this. Also, if these groups were not reached out to during the planning process, the plan must say how they will be included during plan maintenance.</p> <p>FEMA: ADDRESSED</p>		

Element B: Risk Assessment

Element B Requirements	Location in Plan (section and/or page number)	Met / Not Met
B1. Does the plan include a description of the type, location, and extent of all natural hazards that can affect the jurisdiction? Does the plan also include information on previous occurrences of hazard events and on the probability of future hazard events? (Requirement 44 CFR § 201.6(c)(2)(i))		
B1-a. Does the plan describe all natural hazards that can affect the jurisdiction(s) in the planning area, and does it provide the rationale if omitting any natural hazards that are commonly recognized to affect the jurisdiction(s) in the planning area?	Section 4, pp.1-40	Met
B1-b. Does the plan include information on the location of each identified hazard?	Section 5, pp. 1-59; Section 6, pp.1-89	Met
B1-c. Does the plan describe the extent for each identified hazard?	Section 4, pp.1-40	Met
B1-d. Does the plan include the history of previous hazard events for each identified hazard?	Section 5, pp. 1-59	Met
B1-e. Does the plan include the probability of future events for each identified hazard? Does the plan describe the effects of future conditions, including climate change (e.g., long-term weather patterns, average temperature and sea levels), on the type, location and range of anticipated intensities of identified hazards?	Section 5, pp. 1-59	Met
B1-f. For participating jurisdictions in a multi-jurisdictional plan, does the plan describe any hazards that are unique to and/or vary from those affecting the overall planning area?	Section 4, pp.1-40; Section 5, pp. 1-59; Section 6, pp. 1-89	Met

Element B Requirements	Location in Plan (section and/or page number)	Met / Not Met
B2. Does the plan include a summary of the jurisdiction's vulnerability and the impacts on the community from the identified hazards? Does this summary also address NFIP-insured structures that have been repetitively damaged by floods? (Requirement 44 CFR § 201.6(c)(2)(ii))		
	Section 5, pp. 1-59; Section 6, pp. 1-89	Met
B2-b. For each participating jurisdiction, does the plan describe the potential impacts of each of the identified hazards on each participating jurisdiction?	Section 5, pp. 1-59; Section 6, pp. 1-89	Met
B2-c. Does the plan address NFIP-insured structures within each jurisdiction that have been repetitively damaged by floods?	Section 6, pp. 12-13	Met

ELEMENT B REQUIRED REVISIONS

Required Revision:

B1-b: The plan does not provide specific locations within the planning area susceptible to erosion, landslide or invasive species. The landslide profile generally refers to the planning area and to Buckingham County being in a higher landslide hazard area. The plan must include information on location for each identified hazard. Location is usually presented in terms of maps, but may also be met through narrative descriptions or other formats. If a narrative is used, it must be specific enough to clearly describe where problem areas are.

FEMA: ADDRESSED

B1-c: There is no extent listed for [wildfire](#), [hail](#), [landslides](#), [radon](#), sinkholes or invasive species. Extent refers generally to the scientific scale or magnitude of an event. If there is no relevant extent for a profiled hazard, the plan should state that. **FEMA: ADDRESSED**

B1-d: There are no previous events listed for erosion, invasive species or radon. The plan must provide information on previous hazard events. If there have been no previous events, the plan must also state this. **FEMA: ADDRESSED**

B2-b: Almost all of the annualized losses used to put vulnerability into context are at the county level. Information from the National Risk Index is presented in Section 6 of the plan. However, it is broken down by census tract. A multi-jurisdictional plan must describe the potential impacts of each of the identified hazards on each participating jurisdiction. **FEMA: ADDRESSED**

Element C: Mitigation Strategy

Element C Requirements	Location in Plan (section and/or page number)	Met / Not Met
C1. Does the plan document each participant's existing authorities, policies, programs and resources and its ability to expand on and improve these existing policies and programs? (Requirement 44 CFR § 201.6(c)(3))		
C1-a. Does the plan describe how the existing capabilities of each participant are available to support the mitigation strategy? Does this include a discussion of the existing building codes and land use and development ordinances or regulations?	Section 7, pp. 1-22	Met
C1-b. Does the plan describe each participant's ability to expand and improve the identified capabilities to achieve mitigation?	Section 7, pp. 1-22	Met
C2. Does the plan address each jurisdiction's participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement 44 CFR § 201.6(c)(3)(ii))		
C2-a. Does the plan contain a narrative description or a table/list of their participation activities?	Section 7, pp. 8-13	Met
C3. Does the plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement 44 CFR § 201.6(c)(3)(i))		
C3-a. Does the plan include goals to reduce the risk from the hazards identified in the plan?	Section 8, pp. 2-3	Met
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 44 CFR § 201.6(c)(3)(ii))		
C4-a. Does the plan include an analysis of a comprehensive range of actions/projects that each jurisdiction considered to reduce the impacts of hazards identified in the risk assessment?	Section 8, pp. 1-17 Appendices A-I	Met
C4-b. Does the plan include one or more action(s) per jurisdiction for each of the hazards as identified within the plan's risk assessment?	Section 8, pp. 1-17 Appendices A-I	Met

Element C Requirements	Location in Plan (section and/or page number)	Met / Not Met
C5. Does the plan contain an action plan that describes how the actions identified will be prioritized (including a cost-benefit review), implemented, and administered by each jurisdiction? (Requirement 44 CFR § 201.6(c)(3)(iv)); (Requirement §201.6(c)(3)(iii))		
C5-a. Does the plan describe the criteria used for prioritizing actions?	Section 8, p. 6	Met
C5-b. Does the plan provide the position, office, department or agency responsible for implementing/administrating the identified mitigation actions, as well as potential funding sources and expected time frame?	Appendices A-I	Met

ELEMENT C REQUIRED REVISIONS

Required Revision:

C1-b: The plan must state the ability of each participant to expand upon their identified capabilities. If participants do not have the ability to expand on the capabilities in the plan, then the plan must describe this lack of ability or authority. **FEMA: ADDRESSED**

C2-a: The plan specifies the questions that participants were asked to answer to complete Table 7.4 on pages 12 and 13. However, there are no activities listed for the town of Charlotte Court House, Cumberland County, the town of Burkeville, or the town of Crewe. Participating jurisdictions must describe their participation in the National Flood Insurance Program (NFIP). This includes five pieces of information that must be provided for each participant:

1. Adoption of NFIP minimum floodplain management criteria via local regulation.
2. Adoption of the latest effective Flood Insurance Rate Map, if applicable.
3. Implementation and enforcement of local floodplain management regulations to regulate and permit development in Special Flood Hazard Areas.
4. Appointment of a designee or agency to implement the addressed commitments and requirements of the NFIP.
5. Description of how participants carry out the substantial improvement/substantial damage provisions of their floodplain management regulations after an event.

Table 7.4 in the plan does not list the specifics of these required pieces of information. There is only a checkmark indicating whether or not a community has completed the identified activities.

FEMA: ADDRESSED

C4-a: The plan does not include any kind of description or information on the range of actions considered for inclusion in this plan update. Section 8, pages 9-17, includes lists of potential actions for participants. It also includes newly introduced stakeholders Piedmont Geriatric Hospital and the Dillwyn Correctional Center. These actions appear to be holdovers from the previous plan.

FEMA: ADDRESSED

C4-b: The plan must identify one or more mitigation actions per participant per hazard addressed in the risk assessment. While there are some multi-hazard actions in the appendices and in Section 8, they do not address each hazard for each participant. Some of the identified actions are the same as capabilities identified in the capability assessment. Many of the participants identify “reviewing all permits for new development” as an action. However, that is an ongoing capability for communities that participate in the NFIP. The mitigation strategy should identify separate actions that can be directly tied back to the mitigation strategy that will alleviate the risks and vulnerabilities described.

If a hazard does not apply to specific jurisdictions, this must be clearly stated in the plan. If a hazard does not apply to a jurisdiction, they do not need an action. Note that any hazard that applies to the whole planning area or a whole county means that individual jurisdictions must have an action for themselves or “adopt into” a multi-jurisdiction action. **FEMA: ADDRESSED**

Element D: Plan Maintenance

Element D Requirements	Location in Plan (section and/or page number)	Met / Not Met
D1. Is there discussion of how each community will continue public participation in the plan maintenance process? (Requirement 44 CFR § 201.6(c)(4)(iii))		
D1-a. Does the plan describe how communities will continue to seek future public participation after the plan has been approved?	Section 9, p. 4	Met
D2. Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a five-year cycle)? (Requirement 44 CFR § 201.6(c)(4)(i))		
D2-a. Does the plan describe the process that will be followed to track the progress/status of the mitigation actions identified within the Mitigation Strategy, along with when this process will occur and who will be responsible for the process?	Section 9, pp. 3-4	Met
D2-b. Does the plan describe the process that will be followed to evaluate the plan for effectiveness? This process must identify the criteria that will be used to evaluate the information in the plan, along with when this process will occur and who will be responsible.	Section 9, pp. 3-4	Met
D2-c. Does the plan describe the process that will be followed to update the plan, along with when this process will occur and who will be responsible for the process?	Section 9, pp. 3-4	Met
D3. Does the plan describe a process by which each community will integrate the requirements of the mitigation plan into other planning mechanisms, such as comprehensive or capital improvement plans, when appropriate? (Requirement 44 CFR § 201.6(c)(4)(ii))		
D3-a. Does the plan describe the process the community will follow to integrate the ideas, information and strategy of the mitigation plan into other planning mechanisms?	Section 9, p. 4	Met
D3-b. Does the plan identify the planning mechanisms for each plan participant into which the ideas, information and strategy from the mitigation plan may be integrated?	Section 9, p. 4	Met
D3-c. For multi-jurisdictional plans, does the plan describe each participant's individual process for integrating information from the mitigation strategy into their identified planning mechanisms?	Section 9, pp. 1-3	Met

ELEMENT D REQUIRED REVISIONS**Required Revision:**

D1-a: The plan identifies the actions that may be taken to continue public participation. However, element D1-a requires that each participant in the plan describe the process for continued public involvement as a part of plan maintenance. If one process applies to all participants, the plan can say this. **FEMA: ADDRESSED**

D2-a: The plan must identify who will be responsible for tracking the implementation of the mitigation actions over time. Section 9 states that CRC will appoint a “main point of contact with VDEM/FEMA.” Element D2-a specifies that the plan must describe how, when, and by whom the plan will be tracked for implementation. The plan currently does not specify who that person will be. Section 9 also references “designated staff” from each participating locality but fails to identify who those designated representatives are. **FEMA: ADDRESSED**

D2-c: Section 9 of the plan describes a process for reviewing the plan every five years to determine whether there have been significant changes. However, there is no detailed description of the update process that would be taken in five years to update the plan to its next iteration. The plan must identify how, when and by whom the plan will be updated every five years. **FEMA: ADDRESSED**

D3-a: The plan must specify the process by which each participant will integrate information from this plan in their local planning mechanisms. Section 9 of the plan states that “it is recommended that each participating locality create a process by which.” If none of the participating jurisdictions currently have a process by which this plan’s information can be incorporated into their local mechanisms, the plan must state this. **FEMA: ADDRESSED**

D3-b: The plan must specify what planning mechanisms each of the participants have that can benefit from the information from this mitigation plan. Table 7.1 of the plan identifies the planning mechanisms currently in place or under development for each participant. In order to meet this element, the plan must identify which of those plans the information from this mitigation plan can inform. **FEMA: ADDRESSED**

D3-c: For multi-jurisdictional plans, the plan must specify the process by which each participant will integrate information from the mitigation plan into their local planning mechanisms. Five communities are identified as having previously integrated or referenced the plan in their local planning mechanisms. However, for each participating community, the plan must describe the process used to integrate data into other local planning mechanisms. **FEMA: ADDRESSED**

Element E: Plan Update

Element E Requirements	Location in Plan (section and/or page number)	Met / Not Met
E1. Was the plan revised to reflect changes in development? (Requirement 44 CFR § 201.6(d)(3))		
E1-a. Does the plan describe the changes in development that have occurred in hazard-prone areas that have increased or decreased each community’s vulnerability since the previous plan was approved?	Appendices A-I	Met

Element E Requirements	Location in Plan (section and/or page number)	Met / Not Met
E2. Was the plan revised to reflect changes in priorities and progress in local mitigation efforts? (Requirement 44 CFR § 201.6(d)(3))		
E2-a. Does the plan describe how it was revised due to changes in community priorities?	Section 2, pp. 6-12	Met
E2-b. Does the plan include a status update for all mitigation actions identified in the previous mitigation plan?	Section 8, pp. 7-17 Appendices A-I	Met
E2-c. Does the plan describe how jurisdictions integrated the mitigation plan, when appropriate, into other planning mechanisms?	Section 9, pp. 1-2	Met
ELEMENT E REQUIRED REVISIONS		
<p>Required Revision:</p> <p>E1-a: The appendices provide building permit data for the counties and participants in the plan. However, building permit numbers without supporting documentation do not convey how any of these changes in development have increased or decreased the vulnerability to the identified hazards. The plan must detail how these changes in development have or have not changed the vulnerability of each participant to the identified hazards. The information in the community profiles about how the planning area has changed can be expanded on to include this discussion.</p> <p>FEMA: ADDRESSED</p> <p>E2-c: The plan must explain how each participating jurisdiction integrated information from the previous plan in their planning mechanisms. If information from the previous plan was not integrated into other planning mechanisms for each participant, this must be stated.</p> <p>FEMA: ADDRESSED</p>		

Element F: Plan Adoption

Element F Requirements	Location in Plan (section and/or page number)	Met / Not Met
F1. For single-jurisdictional plans, has the governing body of the jurisdiction formally adopted the plan to be eligible for certain FEMA assistance? (Requirement 44 CFR § 201.6(c)(5))		
F1-a. Does the participant include documentation of adoption?	N/A	Choose an item.

Element F Requirements	Location in Plan (section and/or page number)	Met / Not Met
F2. For multi-jurisdictional plans, has the governing body of each jurisdiction officially adopted the plan to be eligible for certain FEMA assistance? (Requirement 44 CFR § 201.6(c)(5))		
F2-a. Did each participant adopt the plan and provide documentation of that adoption?	N/A	Not Met
ELEMENT F REQUIRED REVISIONS		
Required Revision: Click or tap here to enter text.		

Element G: High Hazard Potential Dams (Optional)

HHPD Requirements	Location in Plan (section and/or page number)	Met / Not Met
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?	Section 6a, pp. 1-12	Met
HHPD1-b. Does the plan incorporate information shared by the state and/or local dam owners?	Section 6a, pp. 1-12	Met
HHPD2. Did the plan address HHPDs in the risk assessment?		
HHPD2-a. Does the plan describe the risks and vulnerabilities to and from HHPDs?	Section 6a, pp. 1-12	Met
HHPD2-b. Does the plan document the limitations and describe how to address deficiencies?	Section 6a, pp. 1-12	Met
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?	Section 6a, pp. 1-12 Section 8, p. 2	Met
HHPD3-b. Does the plan link proposed actions to reducing long-term vulnerabilities that are consistent with its goals?	Section 6a, pp. 1-12	Met

HHPD Requirements	Location in Plan (section and/or page number)	Met / Not Met
HHPD4-a. 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?	Section 6a, p. 6	Met
HHPD4-b. Does the plan describe the criteria used to prioritize actions related to HHPDs?	Section 6a, pp. 1-12 Section 8, p. 6	Met
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?	Section 6a, pp. 1-12	Met
HHPD Required Revisions		
Required Revision:		
HHPD1-a: The plan must describe how the plan developer and/or jurisdictions worked with the state dam agency or the local dam owners. Section 6a states that the information on the high-hazard dams in the planning area came from the Commonwealth of Virginia's hazard mitigation plan, which itself cited data from the Virginia Dam Safety and Floodplain Management Office (DSFPM). In order to meet HHPD1-a, the plan must describe the process of coordination with the state dam agency or individually with dam owners. FEMA: ADDRESSED		
HHPD2-a: This element requires that the plan describe all the risks and vulnerabilities to and from HHPDs. This includes potential cascading impacts; potential economic, environmental and social impacts; location and size of populations at risk from the dams; and the methodology and/or assumptions in modeling this risk. FEMA: ADDRESSED		
HHPD2-b: The risk assessment and vulnerability information came from Virginia's state mitigation plan. However, the process by which this information was developed is not included in this mitigation plan. The only potential data deficiency identified in respect to HHPDs in this plan is detailed on page 7 of Section 6a: "According to staff from DSFPM, as of May 4, 2023, GIS data for inundation zones and watersheds is available for about 50% of all high hazard dams statewide." No solution for this data deficiency is described in this mitigation plan. FEMA: ADDRESSED		

Element H: Additional State Requirements (Optional)

Element H Requirements	Location in Plan (section and/or page number)	Met / Not Met
This space is for the State to include additional requirements.		
Click or tap here to enter text.	Click or tap here to enter text.	Choose an item.

Plan Assessment

These comments can be used to help guide your annual/regularly scheduled updates and the next plan update.

Element A. Planning Process

Strengths

- Having information about the previous planning processes is helpful to the planning team for understanding who has participated and provided feedback in past revisions.
- The plan breaks down how each participating community was a part of the planning process.

Opportunities for Improvement

- Develop a clear executive summary outlining plan layout, process, and takeaways.
- Throughout the plan update, several data sources are used are older. Future updates should consider including the most up to date data sources in the plan (census information, most recent state plan, etc.).
- More thoroughly integrate social vulnerability and equity as core facets of the PDC's planning process moving forward. Consider which jurisdictions in the PDC are most underserved and socially vulnerable relative to one another then document how data will inform outreach to underserved and socially vulnerable populations.
- Set up a list of criteria for which the plan's implementation and effectiveness can be evaluated.

Element B. Risk Assessment

Strengths

- The risk assessment includes images of hazard events that participants experienced.
- The risk assessment includes narratives of hazard events in addition to providing a list or table of previous events.
- HMP does a good job of describing and assessing climate change.
- New hazards are included in this update.

Opportunities for Improvement

- Separating the hazard profiles from the vulnerability analysis makes it hard to see cause and effect and to thread that conversation together in a narrative. Recommend combining those sections.
- Consider using the FEMA Resilience Analysis and Planning Tool (RAPT) to overlay nationally available data layers or import County or State data layers, then integrate a clear image of each map into the plan. The RAPT Resource Center provides a quick guide and tips for using the tool.
- Future updates should consider including more county or regional maps, as opposed to state or national level maps, to convey potential risk and impacts.
- Each natural hazard vulnerability assessment section should provide more substantive summary information such as the total number of the historic structures and other asset types that are currently vulnerable to the respective natural hazard and specifically how these impacts are

expected to change (increase or decrease) based on climate change's effects, development changes, demographic changes, and land use changes. When applicable, key demographic and land use change information introduced from the outset of the plan (such as the following) should be more explicitly referred to and analyzed in the narrative of each natural hazard's vulnerability assessment subsection.

Element C. Mitigation Strategy

Strengths

- The plan shares the status of all actions developed during the various versions of the plan. It also indicates when they were completed or removed from the plan.

Opportunities for Improvement

- Consider providing additional details to reduce the generalized nature of each mitigation action by integrating jurisdiction-specific vulnerable assets information from the plan's risk assessment. Generalized actions can be retained, but more tailored and specific actions and/or information should be added to the mitigation strategy.
- The 2023 local mitigation planning handbook identifies four primary types of mitigation actions: plans and regulations; structure and infrastructure projects; natural systems protection; and education and awareness. Future updates to this mitigation plan may want to look at realigning the identified actions to these four categories.

Element D. Plan Maintenance

Strengths

- 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

Opportunities for Improvement

- Add more concrete examples to the plan, such as excerpts from relevant local mechanisms, demonstrating that elements of the PDC's HMP have been integrated into local planning documents and vice versa (since the last plan update).
- Set up a list of criteria for which the plan's implementation and effectiveness can be evaluated.

Element G. HHPD Requirements (Optional)

Opportunities for Improvement

- Add content to the plan further elaborating on the Potential cascading impacts of storms, seismic events, landslides, wildfires, etc. on dams that might affect upstream and downstream flooding potential.
- Consider adding the following to the plan:

- Documentation summarizing structural integrity issues (such as seepage or erosion) related to specific HHPDs.
- Inspection results that describe dam-related deficiencies that could be addressed by specific mitigation actions within the HMP (for instance a mitigation action to develop a dam-related data system, rehabilitate a specific dam, or more).
- Condition assessments or reports that speak to dam specific deficiencies such as an undersized dam spillway relative to the dam's intended design flood.