State Mitigation Plan Review Tool

The State Mitigation Plan Review Tool (**Plan Review Tool**) demonstrates and documents how the state mitigation plan meets the regulations set forth in 44 CFR Part 201 and offers FEMA mitigation planners an opportunity to provide feedback to the state.

The **Regulation Checklist** must be completed by FEMA. The FEMA Plan Approver must reference the State Mitigation Planning Policy Guide when completing the Plan Review Tool. 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 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 should be referenced by the appropriate number, where applicable (e.g., S2-a, S2-b). Requirements for each element and sub-element are described in detail in Sections 3 and 4 of the State Mitigation Planning Policy Guide.

The **HHPD section and FMAG sub-elements** only need to be completed if the state is pursuing eligibility for those grant programs.

The **Plan Assessment** must be completed by FEMA. This assessment provides more comprehensive feedback to the state to acknowledge where the plan exceeds minimum requirements and provides suggestions for improvements. FEMA will describe the strengths that are demonstrated and highlight examples of best practices. FEMA's suggestions for improvement are not required to be made for plan approval.

For greater clarification of the elements in the regulation checklist, please see $\frac{\text{Sections 3}}{\text{Sections 3}}$ and $\frac{4}{\text{Sections 3}}$ in the State Mitigation Planning Policy Guide. This document defines terms and phrases used within this review tool.

1. Plan and Review Information

	Plan Information
State	California
Title and Date of Plan	2023 State Hazard Mitigation Plan
Plan Update Version	5
State Point of Contact Name	Jessica London
Title	Program Manager State Mitigation Planning Unit
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Review Information		
Date Received by FEMA Region 9	June 9, 2023	
FEMA Reviewer (Planning Program)	Emily Breen, Community Planner JoAnn Scordino, Community Planner Xing Liu, Senior Community Planner	
FEMA Reviewer (Hazard Mitigation Assistance)	Stephanie Stephens, Acting Senior Grants Management Specialist	
FEMA Headquarters Reviewer (Enhanced)	Cathleen Carlisle, Mitigation Planner, Risk Management Directorate	
FEMA Approver (Management)	Alison Kearns, Planning and Implementation Branch Chief Kathryn Lipiecki, Mitigation Division Director	
Plan Status (Not Approved, Approvable Pending Adoption, Approved)	Approved	

SUMMARY	YES	NO
STANDARD STATE MITIGATION PLAN		
Does the plan meet the standard state mitigation plan requirements?	X	
ENHANCED STATE MITIGATION PLAN		
Does the plan meet the enhanced state mitigation plan requirements?	X	
HIGH HAZARD POTENTIAL DAM REHBALITATION PROGRAM		
Does the plan meet the mitigation plan requirements for HHPD?	X	
FIRE MANAGEMENT ASSISTANCE GRANT PROGRAM		
Does the plan meet the mitigation plan requirements for FMAG?	X	

2. Standard State Mitigation Plan Regulation Checklist

PLANNING PROCESS

Requirements	Location in Plan (section and/or page number)	Met / Not Met
S1. Does the plan include a description of the process used to develop 201.4(b) and 201.4(c)(1)]	op the plan? [44 CF	R §§
S1-a. Does the plan describe the current process used to update the plan, including how the plan was prepared, the schedule or time frame, specific milestones and activities, the agencies and stakeholders who were involved in the process, and if the mitigation planning process was integrated to the maximum extent possible with other state planning efforts?	Chapter 1, Section 1.2, p1- 13 to 1-22; Appendix D	Met
S2. Does the plan describe how the state coordinated with other agencies and stakeholders? [44 CFR §§ 201.4(b) and 201.4(c)(1)]		
S2-a. Does the plan describe how the state coordinated with other state agencies, appropriate federal agencies, and other stakeholders, and how they were involved in the process?	Chapter 1, Section 1.2.1, p1-14 to 1-18	Met

HAZARD IDENTIFICATION AND RISK ASSESSMENT

Requirements	Location in Plan (section and/or page number)	Met / Not Met	
S3. Does the risk assessment include an overview of the type and local that can affect the state? [44 CFR § $201.4(c)(2)(i)$]	cation of all natural	hazards	
S3-a. Does the plan include a current overview of all natural hazards that can affect the state, including the type, location and previous occurrences?	Sections 1-5 of Chapters 5-19	Met	
S4. Does the risk assessment provide an overview of the probabilities of future hazard events? [44 CFR § 201.4(c)(2)(i)]			
S4-a. Does the risk assessment provide an overview of the probability of future hazard events that includes projected changes in the location, range of anticipated intensities, frequency, and/or duration of each natural hazard?	Section 4.1 of Chapters 5-19	Met	

Requirements	Location in Plan (section and/or page number)	Met / Not Met
S4-b. Does the probability include considerations of changing 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 4.2, 4.3 of Chapters 5-19	Met
S5. Does the risk assessment address the vulnerability of state assessment the potential dollar losses to these assets? [44 CFR §§ 201 201.4(c)(2)(iii)]		areas and
S5-a. Does the risk assessment include an overview and analysis of the vulnerability to state assets from the identified hazards as well as a summary of the most vulnerable assets?	Sections 6.1 and 6.2 of Chapters 5-19	Met
S5-b. Does the risk assessment estimate potential dollar losses to state assets located in identified hazard areas?	Sections 6.1 and 6.2 of Chapters 5-19	Met
S6. Does the risk assessment include an overview and analysis of juridentified hazards and the potential losses? [44 CFR §§ 201.4(c)(2)(i		
S6-a. Does the risk assessment provide an overview and analysis of vulnerable jurisdictions based on the state and local government risk assessments?	Chapter 4; Sections 1-6 of each hazard in Chapters 5-19; Sections 2.5 and 43.4.1; Appendix I	Met
S6-b. Does the risk assessment include an overview and analysis of the potential losses to the identified vulnerable structures based on estimates in the local risk assessments as well as the state risk assessment?	Section 4.1.3; Sections 5 & 6; of Chapters 5- 19; Appendix I	Met
S7. Was the risk assessment revised to reflect changes in development? [44 CFR § 201.4(d)]		
S7-a. Does the plan provide a summary of recent development and potential or projected development in hazard-prone areas based on state and local government risk assessments?	Section 3.5; Section 4.3; Section X.6.3 or X.6.4 for each hazard in Chapters 5-19; Appendix G; Appendix I	Met

STATE MITIGATION CAPABILITIES

Requirements	Location in Plan (section and/or page number)	Met / Not Met
S8. Does the plan discuss the evaluation of the state's hazard manage capabilities, and funding sources to mitigate the hazards identified in CFR § $201.4(c)(3)(ii)$]		
S8-a. Does the plan include an evaluation of state laws, regulations, policies and programs related to hazards that improve or impede resilience to future natural hazard events and other future conditions, including the effects of climate change?	Section 5.7; Chapter 42; Chapter 46; Appendix L, Table-L2	Met
S8-b. Does the plan include a general discussion of state funding capabilities for hazard mitigation actions and projects?	Sections 46.2, 46.3, 51.4, and 53.2; Appendix 0	Met
S8-c. Does the plan include a summary of obstacles, challenges and proposed solutions related to any state capabilities, including a brief discussion of potential strategies for overcoming any challenges related to implementing and enforcing hazard-resistant building codes statewide, as applicable, and changes since the previous plan approval?	Section 46.3	Met

MITIGATION STRATEGY

Requirements	Location in Plan (section and/or page number)	Met / Not Met
S9. Does the mitigation strategy include goals to reduce long-term videntified hazards? [44 CFR § 201.4(c)(3)(i)]	ulnerabilities from t	he
S9-a. Does the plan identify hazard mitigation goals representing what the state seeks to accomplish through mitigation plan implementation using a wide range of funding, including non-FEMA funding?	Chapter 44, p44- 1 to 44-4; Section 47.1	Met
S9-b. Are the goals consistent with the hazards and vulnerabilities identified in the risk assessment?	Chapter 44, p44- 1 to 44-4; Section 47.1	Met

Requirements	Location in Plan (section and/or page number)	Met / Not Met
S10. Does the plan prioritize mitigation actions to reduce vulnerabili assessment? [44 CFR §§ 201.4(c)(3)(i), 201.4(c)(3)(ii) and 201.4(c)(3)(ii)		e risk
S10-a. Does the plan identify actions based on the current risk assessment to reduce the vulnerability of jurisdictions within the state, as well as the vulnerability of state assets as described in Elements S5 and S6?	Chapter 47, p47- 1 to 47-25	Met
S10-b. Does the plan describe the process used by the state to evaluate and prioritize actions that are cost-effective, environmentally sound, and technically feasible?	Sections 45.2, 54.2, 47.1, and 47.2	Met
S10-c. Does the plan describe how each action contributes to the hazard mitigation goals?	Sections 44.1, 47.1, and 47.2	Met
S10-d. Does the plan describe how local government mitigation strategies link to the state mitigation strategy?	Section 44.1	Met
S11. Does the plan identify current and potential sources of funding actions and activities? [44 CFR § 201.4(c)(3)(iv)]	to implement mitig	ation
S11-a. Do mitigation activities include the identification of current and/or potential sources of federal, state, local or private funding for implementation?	Sections 47.1 and 47.2	Met
S11-b. Does the plan identify FEMA mitigation funding sources (if applicable), including, but not limited to: HMGP, BRIC, FMA and PA Mitigation, at a minimum?	Sections 47.1 and 47.2	Met
S12. Was the plan updated to reflect progress in statewide mitigation efforts and changes in priorities? [44 CFR § 201.4(d)]		
S12-a. Does the plan provide a narrative of the status of each mitigation action in the previous plan?	Sections 45.1 and 45.2; Appendix J	Met
S12-b. Was the prioritization of mitigation actions and activities updated based on the updated analysis of risks, capabilities and progress?	Section 45.2	Met

LOCAL PLANNING COORDINATION AND CAPABILITY BUILDING

Requirements	Location in Plan (section and/or page number)	Met / Not Met
S13. Does the plan generally describe and analyze the effectiveness mitigation policies, programs, and capabilities? [44 CFR § 201.4(c)(3)]		t
S13-a. Does the plan provide a summary of current local government policies, programs and capabilities of jurisdictions to accomplish hazard mitigation?	Sections 42.1- 42.9	Met
S13-b. Does the plan describe the effectiveness of local government mitigation policies, programs and capabilities?	Section 42.9	Met
S14. Does the plan describe the process to support the development government mitigation plans? [44 CFR §§ 201.3(c)(5) and 201.4(c)(4)		I
S14-a. Does the plan describe how the state supports developing or updating FEMA-approvable mitigation plans?	Sections 43.1.2, 43.2, 43.3, 43.5, 43.6, and 52.3	Met
S14-b. Does the plan provide a brief summary of barriers to developing or updating, adopting, and implementing FEMA-approved local government mitigation plans based on an analysis of plan and jurisdiction coverage data and trends across the state and steps to remove barriers to help local governments advance mitigation planning, including how plan and jurisdiction coverage data and trends inform those steps?	Section 42.9	Met
S15. Does the plan describe the criteria for prioritizing funding? [44	CFR § 201.4(c)(4)(ii	i)]
S15-a. Does the plan describe criteria for prioritizing jurisdictions to receive planning and project grants under available federal and non-federal programs?	Section 54.2	Met
S16. Does the plan describe the process and time frame to review, coordinate, and link local and tribal mitigation plans with the state mitigation plan? [44 CFR §§ 201.3(c)(6), 201.4(c)(2)(ii), 201.4(c)(3)(iii), and 201.4(c)(4)(ii)]		
S16-a. Does the plan describe the state's process and time frame to review and submit approvable local and tribal mitigation plans to FEMA?	Sections 43.5 and 51.5.5	Met
S16-b. Does the plan describe the state's process and time frame to share risk assessment data and mitigation priorities with local governments for their plan updates, as well as integrate local risk assessment and mitigation actions into the state mitigation plan updates?	Section 43.4, 2.5.2	Met

REVIEW, EVALUATION, AND IMPLEMENTATION

Requirements	Location in Plan (section and/or page number)	Met / Not Met
S17. Is there a description of the method and schedule for keeping to 201.4(c)(5)(i) and 201.4(d)]	he plan current? [4-	4 CFR §§
S17-a. Does the plan describe the agency/office responsible for monitoring, evaluating and updating the plan?	Section 48.3	Met
S17-b. Does the plan describe the schedule for monitoring, evaluating, and updating the plan?	Section 48.3	Met
S18. Does the plan describe the systems for monitoring implementation and reviewing progress? [44 CFR §§ 201.4(c)(5)(ii) and 201.4(c)(5)(iii)]		
S18-a. Does the plan describe the system for tracking the implementation of the mitigation activities and projects identified in the mitigation strategy, including all mitigation activities and not just those funded by FEMA?	Section 48.2	Met
S18-b. Does the system include the schedule, the agency/office responsible for coordination, and the role of the agencies/offices identified in the mitigation strategy as responsible for implementation of actions?	Section 48.2	Met
S18-c. Does the plan describe a system for reviewing progress on achieving the mitigation strategy's goals that includes the criteria and process for evaluating progress?	Section 48.2	Met

ADOPTION AND ASSURANCES

Requirements	Location in Plan (section and/or page number)	Met / Not Met
S19. Did the state provide documentation that the plan has been for $201.4(c)(6)$	mally adopted? [44	CFR §
S19-a. Did the state provide documentation of formal adoption by the highest elected official or designee prior to FEMA approval?	Click or tap here to enter text.	Met
S20. Did the state provide assurances? [44 CFR § 201.4(c)(7)]		
S20-a. Does the plan include assurances that the state will manage and administer FEMA funding in accordance with applicable federal statutes and regulations?	Section 48.4	Met

Requirements	Location in Plan (section and/or page number)	Met / Not Met
S20-b. Does the plan include assurances that the state will update its plan whenever necessary to reflect changes in state or federal laws and statutes?	Section 48.4	Met

HIGH HAZARD POTENTIAL DAMS

Requirements	Location in Plan (section and/or page number)	Met / Not Met
HHPD1. Did Element S2 (planning process) describe how the state dam safety agency, other agencies, and stakeholders participated in the planning process and contributed expertise, data, studies, information, etc. relative to high hazard potential dams?		
HHPD1-a. Does the plan describe how the state dam safety agency, other agencies, and stakeholders were involved in the planning process?	Section 1.2.1; Appendix D	Met
HHPD1-b. Does the plan describe the types of data contributed?	Chapter 15, Appendix S	Met
HHPD2. Did Element S6 (risk assessment) address all dam risk for high hazard potential dams in the risk assessment?		
HHPD2-a. Does the plan provide a list of high hazard potential dams that have been identified by the state with their names, National Inventory of Dams identification numbers, locations by jurisdiction, and other relevant information, as well as maps?	Sections 15.2.1 and 15.2.2; Appendix S	Met
HHPD2-b. Does the plan summarize statewide vulnerabilities to/from high hazard potential dams from hazards and the potential consequences associated with dam incidents?	Chapter 15	Met
HHPD2-c. Does the plan document limitations and describe the approach to address deficiencies?	Section 15.2.3	Met
HHPD3. Did Element S9 (mitigation goals) include mitigation goals to reduce long-term vulnerabilities from high hazard potential dams?		
HHPD3-a. Does the plan address a reduction in vulnerabilities to/from high hazard potential dams from hazards and the potential consequences associated with dam incidents as part of their own goals or with other long-term strategies?	Chapter 44	Met

Requirements	Location in Plan (section and/or page number)	Met / Not Met
HHPD3-b. Does the plan link the proposed actions to reduce long-term vulnerabilities consistent with the goals?	Sections 47.1 and 47.2	Met
HHPD4. Did Element S10 (mitigation actions) prioritize mitigation actions vulnerabilities from high hazard potential dams?	tions and activities	to reduce
HHPD4-a. Does the plan include actions to reduce vulnerabilities to/from high hazard potential dams?	Section 47.2	Met
HHPD4-b. Does the plan describe the process to evaluate and prioritize actions related to high hazard potential dams that are cost-effective, environmentally sound and technically feasible?	Sections 45.2 and 47.2	Met
HHPD4-c. Does the plan describe how each action to reduce risks related to high hazard potential dams contributes to the goals and describe how strategies are linked to the state mitigation strategy?	Section 47.1 and 47.2	Met
HHPD5. Did Element S11 (funding sources) identify current and potential sources of funding to implement mitigation actions and activities for high hazard potential dams?		
HHPD5-a. Does the plan include various funding sources to mitigate vulnerabilities to and from high hazard potential dams from hazards and the potential consequences associated with dam incidents, as well as funding sources to rehabilitate or remove high hazard potential dams?	Section 47.2	Met
HHPD6. Did Element S13 (local coordination) generally describe and local mitigation policies, programs, and capabilities that address hig		
HHPD6-a. Does the plan provide a summary of the local policies, programs, and capabilities to implement mitigation actions and reduce vulnerabilities from high hazard potential dams from hazards and the potential consequences associated with dam incidents?	Sections 15.2.1 and 42.8.1; Appendix S	Met
HHPD6-b. Does the plan describe challenges to implementing local mitigation policies, programs and capabilities to reduce vulnerabilities to and from high hazard potential dams and the approach to overcome these challenges?	Section 42.8.1	Met
HHPD6-c. Does the plan describe opportunities for implementing mitigation actions to reduce risks to and from high hazard potential dams through local capabilities?	Section 42.8.1	Met

Requirements	Location in Plan (section and/or page number)	Met / Not Met
HHPD7. Did Element S15 (prioritizing funding) describe the criteria fe hazard potential dams?	or prioritizing fundir	ng for high
HHPD7-a. Does the plan describe the method for funding actions to reduce vulnerabilities to and from high hazard potential dams if these actions were prioritized differently than mitigation actions for other hazards?	Section 54.2.8	Met
HHPD7-b. Does the plan document limitations and describe the approach to addressing deficiencies?	Section 54.2.8	Met

FIRE MANAGEMENT ASSISTANCE GRANTS

Requirements	Location in Plan (section and/or page number)	Met / Not Met
FMAG1. Does the plan address wildfire risks? [44 CFR 201.4(c)(2); 4	4 CFR § 204.51(d)(2)]
FMAG1-a. Does the risk assessment provide an overview of the location and previous occurrences of wildfire hazards in the state?	Sections 10.2 and 10.3	Met
FMAG1-b. Does the risk assessment provide an overview of the probability of future wildfire events that includes projected changes in the location, intensity, frequency and/or duration of wildfire hazards?	Sections 10.2 - 10.5	Met
FMAG1-c. Does the risk assessment address the vulnerability of state assets located in wildfire hazard areas and estimate the potential dollar losses to those assets?	Section 10.6	Met
FMAG1-d. Does the risk assessment include an overview and analysis of local governments' vulnerability to wildfires and the potential losses to vulnerable structures?	Chapter 9, Appendix I	Met
FMAG2. Does the plan's mitigation strategy contain wildfire-related mitigation initiatives? [44 CFR 201.4(c)(3); 44 CFR § 204.51(d)(2)]		
FMAG2-a. Does the mitigation strategy identify mitigation actions and activities to reduce the vulnerability of jurisdictions within the state as well as the vulnerability of state-owned assets as described in Elements S5 and S6?	Section 47.2	Met

3. Enhanced State Mitigation Plan Regulation Checklist

ENHANCED STATE PREREQUISITES

Requirements	Location in Plan (section and/or page number)	Met / Not Met
E1. Does the enhanced plan include all elements of the standard state mitigation plan? [44 CFR § 201.5(b)]		
E1-a. Does the enhanced plan meet all the required elements of the standard state mitigation plan?	Noted in requirements above.	Met
E2. Regarding HMA, is the state maintaining the capability to meet a submitting complete project applications? [44 CFR § 201.5(b)(2)(iii)(nes and
E2-a. Are all applications complete and submitted by the end of each program's respective application period?	Section 50.1	Met
E2-b. Are all applications entered into FEMA's electronic data systems (i.e., NEMIS, eGrants, and/or FEMA GO)?	Section 50.3	Met
E2-c. Is a complete Minimum Criteria Checklist for Project Sub applicants or equivalent documentation prepared for all sub applications?	Section 50.3	Met
E2-d. Are all applications determined to be complete by FEMA within 90 days of submittal or selection for further review, or after the first request for information response?	Section 50.3	Met
E3. Regarding HMA, is the state maintaining the capability to prepare environmental reviews and benefit-cost analyses? [44 CFR § 201.5(b)]		ate
E3-a. Are all applications and amendments determined to be complete by FEMA within 90 days of submittal or selection for further review, or after the first request for information response, including all data requested by FEMA to support cost-effectiveness determinations and EHP compliance reviews?	Sections 50.3 and 50.4	Met
E4. Regarding HMA, is the state maintaining the capability to submit complete and accurate quarterly progress and financial reports on time? [44 CFR § 201.5(b)(2)(iii)(C)]		
E4-a. Are all progress reports complete and submitted on time?	Section 50.5	Met
E4-b. Are all FFR SF-425s submitted on time?	Section 50.5	Met
E4-c. Does the state consistently comply with the Financial Management Standard requirements described in 2 CFR §§ 200.300 to 200.309?	Section 50.5	Met

Requirements	Location in Plan (section and/or page number)	Met / Not Met
E5. Regarding HMA, is the state maintaining the capability to complete HMA projects within established performance periods, including financial reconciliation? [44 CFR § 201.5(b)(2)(iii)(D)]		
E5-a. Is all work as part of HMA subawards completed by the end of the period of performance, as described in the HMA Guidance?	Section 50.5	Met
E5-b. Have there been no major findings on the last single audit obtained by the state related to HMA programs?	Section 50.5	Met
E5-c. Are all grant closeout activities, including financial reconciliation, completed within 120 days from the end of the performance period as outlined in 2 CFR 200.344?	Section 50.6	Met
E5-d. Have actual expenditures been documented and are they consistent with SF-424A or SF-424C?	Section 50.6	Met

INTEGRATED PLANNING

Requirements	Location in Plan (section and/or page number)	Met / Not Met
E6. Does the plan demonstrate integration, to the extent practicable regional planning initiatives and FEMA mitigation programs and initial $201.5(b)(1)$		nd/or
E6-a. Does the enhanced plan demonstrate integration with other state and/or regional planning initiatives?	Sections 51.1 - 51.4 and 52.2	Met
E6-b. Does the enhanced plan demonstrate integration of FEMA mitigation programs and initiatives?	Section 51.5	Met

DEMONSTRATING COMMITMENT TO A COMPREHENSIVE STATE MITIGATION PROGRAM

Requirements	Location in Plan (section and/or page number)	Met / Not Met
E7. Does the state demonstrate commitment to a comprehensive m §§ 201.3(c), 201.5(b)(4) and 201.6(d)]	itigation program?	[44 CFR
E7-a. Does the state demonstrate commitment to statewide programs, initiatives and plans that advance mitigation and resilience?	Section 52.1	Met
E7-b. Does the state demonstrate a commitment to mitigation training and capability building?	Section 52.3	Met

Requirements	Location in Plan (section and/or page number)	Met / Not Met
E7-c. Does the state demonstrate a commitment to its mitigation planning responsibilities by helping local governments update and adopt their plans before they expire?	Sections 43.2, 43.5, and 52.3	Met

EFFECTIVE USE OF EXISTING MITIGATION PROGRAMS TO ACHIEVE MITIGATION GOALS

Requirements	Location in Plan (section and/or page number)	Met / Not Met
E8. Is the state effectively using existing mitigation programs to ach CFR §§ 201.5(a) and 201.5(b)(3)]	ieve mitigation goal	s? [44
E8-a. Does the state demonstrate and document the full and effective use of existing FEMA programs (if funding is available)?	Section 53.1	Met
E8-b. Does the state demonstrate and document the full and effective use of non-FEMA programs?	Sections 53.1 - 53.3	Met

DOCUMENTATION OF THE STATE'S IMPLEMENTATION CAPABILITY

Requirements	Location in Plan (section and/or page number)	Met / Not Met
E9. Does the enhanced plan document capability to implement mitige $201.5(b)(2)(i), 201.5(b)(2)(ii),$ and $201.5(b)(2)(iv)$]	gation actions? [44	CFR §§
E9-a. Does the enhanced plan describe the system to rank the mitigation measures according to established eligibility criteria, including a process to prioritize between funding programs, jurisdictions, and proposals that address different or multiple hazards?	Section 54.2	Met
E9-b. Does the enhanced plan describe how the state will assess the effectiveness of mitigation actions, mitigation the agencies that are involved as well as the timeline, and use the results to inform the mitigation strategy?	Section 54.2	Met