

Local Mitigation Planning Policy Side-by-Side Comparison

This document shows, side by side, the changes in required elements in the updated 2022 [Local Mitigation Planning Policy Guide](#) (FP 206-21-0002) with respect to two policies:

- The 2011 [Local Mitigation Plan Review Guide](#)
- The 2020 [HHPD Grant Guidance \(FP 104-008-7\)](#)

Staff who review and approve local mitigation plans can quickly see where policies changed. This document includes only the requirements. FEMA also updated the narratives in the 2022 version. New and updated wording is highlighted. Minor differences in grammar and capitalization are not highlighted. Material deleted from the 2011 version is not called out in the 2022 column.

Standard Elements

Element A: Planning Process

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
A1. Does the Plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction? 44 CFR 201.6(c)(1)	
a. Documentation of how the plan was prepared must include the schedule or timeframe and activities that made up the plan's development as well as who was involved. Documentation typically is met with a narrative description, but may also include, for example, other documentation such as copies of meeting minutes, sign-in sheets, or newspaper articles. Document means provide the factual evidence for how the jurisdictions developed the plan. b. The plan must list the jurisdiction(s) participating in the plan that seek approval. c. The plan must identify who represented each jurisdiction. The Plan must provide, at a minimum,	A1-a. The plan must describe the current planning process. Documentation requirements typically are met with a narrative description, but may also include other records such as copies of meeting minutes, sign-in sheets or newspaper articles. When a narrative description is provided, supporting documentation such as meeting minutes, sign-in sheets, etc., does not need to be included in the plan itself. Planners are encouraged to retain supporting documentation in a Plan Appendix as a record of how decisions were made and who was involved. Document means to provide factual evidence for how the participants developed/updated the plan. Involvement means being engaged and actively participating in the development of the plan; providing input and directly providing, affecting or editing plan



FEMA

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
the jurisdiction represented and the person's position or title and agency within the jurisdiction. d. For each jurisdiction seeking plan approval, the plan must document how they were involved in the planning process. For example, the plan may document meetings attended, data provided, or stakeholder and public involvement activities offered. Jurisdictions that adopt the plan without documenting how they participated in the planning process will not be approved. <i>Involved in the process means engaged as participants and given the chance to provide input to affect the plan's content. This is more than simply being invited (See "opportunity to be involved in the planning process" in A2 below) or only adopting the plan.</i> e. Plan updates must include documentation of the current planning process undertaken to update the plan.	content as the representative of the participating jurisdiction(s) or organization. <i>If applicable, ensure that participating Community Rating System (CRS) jurisdictions maximize points throughout the planning process.</i> A1-b. The plan must list the representatives from each of the participants in the current plan that will seek approval, and how they participated in the planning process. The plan must identify who participated, by agency and title. (Formerly A1-c) Participant means any local government or entity developing or updating a local mitigation plan. Participation means being engaged and having the chance to provide input on the plan. It can be defined and met in a variety of ways (such as attendance at meetings, reviewing and commenting on drafts, etc.).
A2. Does the Plan document an opportunity for neighboring communities, local and regional agencies involved in mitigation activities, 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? (44 CFR § 201.6(b)(2))	
a. The plan must identify all stakeholders involved or given an opportunity to be involved in the planning process. At a minimum, stakeholders must include: 1. Local and regional agencies involved in hazard mitigation activities; 2. Agencies that have the authority to regulate development; and 3. Neighboring communities. <i>An opportunity to be involved in the planning process means that the stakeholders are engaged or invited as participants and given the chance to provide input to affect the plan's content.</i> b. The Plan must provide the agency or organization represented and the person's position or title within the agency. c. The plan must identify how the stakeholders were invited to participate in the process. Examples of stakeholders include, but are not limited to:	A2-a. The plan must provide documentation of an opportunity for stakeholders to be involved in the current planning process. Documentation of this opportunity must identify how each of the following types of stakeholders were presented with this opportunity, as applicable. ▪ Local and regional agencies involved in hazard mitigation activities: Examples include public works, emergency management, local floodplain administration and Geographic Information Systems (GIS) departments. ▪ Agencies that have the authority to regulate development: Examples include: zoning, planning, community and economic development departments; building officials; planning commissions; or other elected officials. ▪ Neighboring communities: Examples include adjacent local governments, including special districts, such as those that are affected by similar hazard events or may share a mitigation action or project that crosses boundaries. Neighboring communities may be partners in hazard mitigation

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
- Local and regional agencies involved in hazard mitigation include public works, zoning, emergency management, local floodplain administrators, special districts, and GIS departments. - Agencies that have the authority to regulate development include planning and community development departments, building officials, planning commissions, or other elected officials. - Neighboring communities include adjacent counties and municipalities, such as those that are affected by similar hazard events or may be partners in hazard mitigation and response activities. - Other interests may be defined by each jurisdiction and will vary with each one. These include, but are not limited to, business, academia, and other private and non-profit interests depending on the unique characteristics of the community.	and response activities, or may be where critical assets, such as dams, are located. - Representatives of businesses, academia, and other private organizations: Examples include private utilities or major employers that sustain community lifelines. - Representatives of nonprofit organizations, including community-based organizations, that work directly with and/or provide support to underserved communities and socially vulnerable populations, among others: Examples include housing, healthcare or social service agencies. An opportunity to be involved in the planning process means that these stakeholders are invited to be engaged or are asked to provide information or input to inform the plan's content. Different communities may necessitate more targeted outreach and engagement, especially underserved communities. Community Lifelines are the most fundamental services in the community that, when stabilized, enable all other aspects of society to function. The integrated network of assets, services and capabilities that provide community lifeline services are used day to day to support recurring needs. Lifelines enable the continuous operation of critical government and business functions and are essential to human health and safety or economic security, as described in the National Response Framework, 4th Edition. <i>The specific entities may be defined by each jurisdiction based on the unique characteristics of the local government, including special districts. The purpose of inviting input is to integrate natural hazard risk reduction across all community systems, as well as encourage implementation of mitigation actions.</i>
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))	
a. The plan must document how the public was given the opportunity to be involved in the planning process and how their feedback was incorporated into the plan. Examples include, but are not limited to, sign-in sheets from open meetings, interactive websites with drafts for public review and comment, questionnaires or surveys, or booths at popular community events.	A3-a. The plan must document how the public had an opportunity to be involved in the current planning process, and what that participation entailed, including how underserved communities and vulnerable populations within the planning area were provided an opportunity to be involved. The opportunity must occur during the plan's development, which means prior to the plan's submission for formal review. In addition, the plan must

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
b. The opportunity for participation must occur during the plan development, which is prior to the comment period on the final plan and prior to the plan approval / adoption.	document how public feedback was included throughout the planning process. <i>Examples of documentation include, but are not limited to, narratives, materials from open meetings, screenshots of social media postings and/or interactive websites with drafts for public review and comment, questionnaires or surveys through utility bills, etc.</i>
A4. Does the plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement 44 CFR § 201.6(b)(3))	
a. The plan must document <i>what</i> existing plans, studies, reports, and technical information were reviewed. Examples of the types of existing sources reviewed include, but are not limited to, the state hazard mitigation plan, local comprehensive plans, hazard specific reports, and flood insurance studies. b. The plan must document <i>how</i> relevant information was incorporated into the mitigation plan. <i>Incorporate means to reference or include information from other existing sources to form the content of the mitigation plan.</i>	A4-a. The plan must document what existing plans, studies, reports and technical information were reviewed and how they were incorporated, if appropriate, into the development/update of the plan. For jurisdictions with structures for which National Flood Insurance Program (NFIP) coverage is available, regulatory flood mapping products are required to be incorporated, if appropriate. <i>Participants may use other jurisdiction-specific materials, including non-regulatory flood mapping products, that improve upon NFIP regulatory flood mapping products.</i> <i>Gaps and limitations may be addressed as actions in the mitigation strategy, in particular for items that require additional assistance.</i> Incorporate means to reference or include information from other existing sources to form the content of the mitigation plan. <i>The documentation requirement may be met with narrative or citations (i.e., footnotes, in-text citations or a bibliography). Examples of the types of existing sources include, but are not limited to: the state hazard mitigation plan; local plans (such as comprehensive/master/general land use, economic development, capital improvement, affordable housing, resource management, resilience, climate, etc.); and hazard-specific reports and plans (such as Community Wildfire Protection Plans).</i>

Element B: Risk Assessment

2011 [Local Mitigation Plan Review Guide](#)

2022 [Local Mitigation Planning Policy Guide](#) (changes in yellow)

B1 (formerly B1 and B2). 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))

Note: Elements B1 and B2 of the 2011 PRT were combined into Element B1 in the 2022 PRT.

B1.

- a. The plan must include a description of the natural hazards that can affect the jurisdiction(s) in the planning area.

A ***natural hazard*** is a source of harm or difficulty created by a meteorological, environmental, or geological event. The plan **must** address natural hazards. Manmade or human-caused hazards may be included in the document, but these are not required and will not be reviewed to meet the requirements for natural hazards. In addition, FEMA will not require the removal of this extra information prior to plan approval.

- b. The plan **must** provide the rationale for the omission of any natural hazards that are commonly recognized to affect the jurisdiction(s) in the planning area.

- c. The description, or profile, **must** include information on location, extent, previous occurrences, and future probability for each hazard. Previous occurrences and future probability are addressed in sub-element B2.

The information does not necessarily need to be described or presented separately for location, extent, previous occurrences, and future probability. For example, for some hazards, one map with explanatory text could provide information on location, extent, and future probability.

Location means the geographic areas in the planning area that are affected by the hazard. For many hazards, maps are the best way to illustrate location. However, location may be described in other formats. For example, if a geographically-specific location cannot be identified for a hazard,

B1-a. The plan must include a description of all natural hazards that can affect the jurisdiction(s) in the planning area and their assets, such as dams, located outside of the planning area. This requirement may be met with either a narrative description or definition.

The plan must provide the rationale if omitting any natural hazards that are commonly recognized to affect the participant(s) in the planning area. There is no prescribed method for explaining the omission, but the plan must demonstrate the lack of risk to the participant(s) that omits the hazard.

Natural hazards are a source of harm or difficulty created by a meteorological, environmental or geological event. Natural hazards, such as flooding and earthquakes, impact the built environment, including dams and levees.

Identifying hazards includes identifying all the types of hazards that can occur, e.g., the different types of flood hazards (flash, riverine, storm surge, debris flows, ice jams, dam/levee failure, etc.).

B1-b. The plan must include information on location for each identified hazard.

Location is defined as the unique geographic boundaries within the planning area, or assets outside of geographic boundaries that may be affected by the identified hazard. Maps are an efficient way to illustrate location. However, location may be described through plan narratives or other formats.

If maps are used, provide sufficient detail and scale to clearly identify the hazard locations within and/or affecting assets owned by the participating jurisdiction(s). If narrative descriptions are used, they must contain enough detail to clearly identify the area(s) (and assets, as applicable) that will be affected by the hazard.

2011 [Local Mitigation Plan Review Guide](#)

such as tornados, the plan may state that the entire planning area is equally at risk to that hazard.

Extent means the strength or magnitude of the hazard. For example, extent could be described in terms of the specific measurement of an occurrence on a scientific scale (for example, Enhanced Fujita Scale, Saffir-Simpson Hurricane Scale, Richter Scale, flood depth grids) and/or other hazard factors, such as duration and speed of onset. Extent is not the same as impacts, which are described in sub-element B3.

- d. For participating jurisdictions in a multi-jurisdictional plan, the plan must describe any hazards that are unique and/or varied from those affecting the overall planning area.

B2.

- a. The plan **must** include the history of previous hazard events for each of the identified hazards.
- b. The plan **must** include the probability of future events for each identified hazard.

Probability means the likelihood of the hazard occurring and may be defined in terms of general descriptors (for example, unlikely, likely, highly likely), historical frequencies, statistical probabilities (for example: 1% chance of occurrence in any given year), and/or hazard probability maps. If general descriptors are used, then they must be defined in the plan. For example, “highly likely” could be defined as equals near 100% chance of occurrence next year or happens every year.

- c. Plan updates must include hazard events that have occurred since the last plan was developed.

2022 [Local Mitigation Planning Policy Guide](#) (changes in yellow)

B1-c. The plan must provide the extent of the hazards that can affect the planning area. When describing extent using charts or scales (e.g., Saffir-Simpson scale for hurricane wind speed; Enhanced Fujita scale for tornado), the plan must document how the scale applies to each jurisdiction.

Extent is defined as the range of anticipated intensities of the identified hazards. The information must relate to each of the plan participants or the planning area, depending on the hazard. Extent is most commonly expressed using various scientific scales.

B1-d. The plan must include information on previous hazard events for each hazard that affects the planning area. At a minimum, this includes any state and federal major disaster declarations for the planning area since the last update.

Previous occurrences can be included in a variety of ways, but should include an emphasis on significant events, as determined by the community. If no events have occurred for a hazard, this must be stated.

B1-e. The plan must include the probability of future events for the identified hazards that can affect the planning area. Probability may be met in a variety of ways; however, general descriptors must be quantitatively defined.

Probability must include 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.

Probability of future hazard events means the likelihood of the hazard occurring or reoccurring. It may be defined in historical frequencies, statistical probabilities, hazard probability maps and/or general descriptors (e.g., unlikely, likely, highly likely). If general descriptors are used, they must be quantified or defined in the plan. For example, “highly likely” could be defined as “100% chance of occurrence next year” or “one event every year.”

B1-f. For multi-jurisdictional plans, when hazard risks differ across the planning area and between participating jurisdictions, the plan must specify the unique and varied risk information for each applicable jurisdiction and their assets outside the planning area.

2011 [Local Mitigation Plan Review Guide](#)2022 [Local Mitigation Planning Policy Guide](#) (changes in yellow)

B2 (formerly B3 and B4). 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))

Note: Elements B3 and B4 of the 2011 PRT were combined into Element B2 in the 2022 PRT.

B3.

- a. For each participating jurisdiction, the plan **must** describe the potential impacts of each of the identified hazards on the community.

***Impact** means the consequence or effect of the hazard on the community and its assets. Assets are determined by the community and include, for example, people, structures, facilities, systems, capabilities, and/or activities that have value to the community. For example, impacts could be described by referencing historical disaster impacts and/or an estimate of potential future losses (such as percent damage of total exposure).*

- b. The plan **must** provide an overall summary of each jurisdiction's vulnerability to the identified hazards. The overall summary of vulnerability identifies structures, systems, populations or other community assets as defined by the community that are susceptible to damage and loss from hazard events. A plan will meet this sub-element by addressing the requirements described in §201.6(c)(2)(ii)(A-C).

Vulnerable assets and potential losses is more than a list of the total exposure of population, structures, and critical facilities in the planning area. An example of an overall summary is a list of key issues or problem statements that clearly describes the community's greatest vulnerabilities and that will be addressed in the mitigation strategy.

B4.

- a. The plan must describe the types (residential, commercial, institutional, etc.) and estimate the

B2-a. The plan must describe the vulnerability of each participant to the identified hazards. The description must include current and future assets (including people) and the risk that makes them susceptible to damage from the identified hazards.

For plan updates, the risk assessment must meet element E1-a.

The risk assessment must describe the vulnerability of plan participant(s) to each identified hazard. The vulnerability description must include a summary (such as a problem statement) of the hazard and its consequences or effects on the participant(s) and their assets. A list of assets without context is not sufficient.

Vulnerability is a description of which assets, including structures, systems, populations and other assets as defined by the community, within locations identified to be hazard prone, are at risk from the effects of the identified hazard(s).

Assets are determined by the community and include, but are not limited to:

- People (including underserved communities and socially vulnerable populations).
- Structures (including facilities, lifelines and critical infrastructure).
- Systems (including networks and capabilities).
- Natural, historic, and cultural resources.
- Activities that have value to the community.

To form the vulnerability description, plan participant(s) may identify which specific assets are most important and most susceptible to damage or loss from hazards. (For example, this may be expressed as replacement cost).

2011 [Local Mitigation Plan Review Guide](#)

numbers of repetitive loss properties located in identified flood hazard areas.

Repetitive loss properties are those for which two or more losses of at least \$1,000 each have been paid under the National Flood Insurance Program (NFIP) within any 10-year period since 1978.

Severe repetitive loss properties are residential properties that have at least four NFIP payments over \$5,000 each and the cumulative amount of such claims exceeds \$20,000, or at least two separate claims payments with the cumulative amount exceeding the market value of the building.

Use of flood insurance claim and disaster assistance information is subject to The Privacy Act of 1974, as amended, which prohibits public release of the names of policy holders or recipients of financial assistance and the amount of the claim payment or assistance. However, maps showing general areas where claims have been paid can be made public. If a plan includes the names of policy holders or recipients of financial assistance and the amount of the claim payment or assistance, the plan cannot be approved until this Privacy Act covered information is removed from the plan.

2022 [Local Mitigation Planning Policy Guide](#) (changes in yellow)

B2-b. The plan must describe the potential impacts on each participating jurisdiction and its identified assets.

Impacts must include the effects of climate change, changes in population patterns (migration, density, or the makeup of socially vulnerable populations), and changes in land use and development.

Impacts are the consequences or effects of each hazard on the participant's assets identified in the vulnerability assessment. For example, impacts could be described by referencing historical disaster damages with an estimate of potential future losses (such as percentage of damage vs. total exposure).

Gaps and limitations may be addressed as actions in the mitigation strategy, in particular for items that require additional assistance.

B2-c. The plan must address repetitively flooded NFIP-insured structures by including the estimated numbers and types (residential, commercial, institutional, etc.) of repetitive/severe repetitive loss properties.

Participants should consider addressing all properties at high risk of flooding that may not be NFIP repetitive loss properties. For example, properties in the Special Flood Hazard Area (SFHA) with their lowest floor below the established Base Flood Elevation are at risk of flood damage from the base flood and potentially from more frequent flood events.

Repetitive loss structure means a structure covered under an NFIP flood insurance policy that (1) has incurred flood-related damage on two occasions, in which the cost of repair, on average, equaled or exceeded 25% of the value of the structure at the time of each such flood event; and (2) at the time of the second incidence of flood-related damage, the contract for flood insurance contains increased cost of compliance coverage. (44 CFR § 77.2(i))

Severe repetitive loss structure means a structure that is covered under an NFIP flood insurance policy and has incurred flood-related damage (1) for which

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
	four or more separate claims have been made under flood insurance coverage, with the amount of each claim (including building and contents payments) exceeding \$5,000 and with the cumulative amount of such claims payments exceeding \$20,000; or (2) for which at least two separate flood insurance claims payments (building payments only) have been made, with cumulative amount of such claims exceeding the value of the insured structure. (44 CFR § 77.2(j)) <i>Use of flood insurance claim and disaster assistance information is subject to The Privacy Act of 1974, as amended, which prohibits public release of the names of policyholders or recipients of financial assistance and the amount of the claim payment or assistance. However, maps showing general areas where claims have been paid can be made public. If a plan includes the names of policyholders or recipients of financial assistance, or the amount of the claim payment or assistance, the plan cannot be approved until the information covered by the Privacy Act is removed from the plan or is properly protected per the Privacy Act.</i>

Element C: Mitigation Strategy

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
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)) a. The plan must describe each jurisdiction's existing authorities, policies, programs and resources available to accomplish hazard mitigation. Examples include, but are not limited to: staff involved in local planning activities, public works, and emergency management; funding through taxing authority, and annual budgets; or regulatory authorities for comprehensive planning, building codes, and ordinances.	
	C1-a. The plan must describe how the existing authorities, policies, programs, funding and resources of each participant are available to support the mitigation strategy. This must include a discussion of the existing building codes and land use and development ordinances or regulations. Capabilities may be described in a table or narrative. Discussion means a narrative or other materials that provide context on a section of the plan. Describing the current capabilities provides a rationale for which mitigation projects can be undertaken to address the vulnerabilities identified in the Risk Assessment.

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
	C1-b. The plan must describe the ability of each participant to expand on and improve the capabilities described in the plan. If the participants do not have the ability or authority to expand and/or improve their capabilities, the plan must describe this lack of ability or authority. <i>Gaps and limitations for each participant may be addressed as actions in the mitigation strategy.</i>
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))	
a. The plan must describe each jurisdiction's participation in the NFIP and describe their floodplain management program for continued compliance. Simply stating "The community will continue to comply with NFIP," will not meet this requirement. The description could include, but is not limited to: - Adoption and enforcement of floodplain management requirements, including regulating new construction in Special Flood Hazard Areas (SFHAs); - Floodplain identification and mapping, including any local requests for map updates; or - Description of community assistance and monitoring activities. Jurisdictions that are currently not participating in the NFIP and where an FHBM or FIRM has been issued may meet this requirement by describing the reasons why the community does not participate.	C2-a. The plan must describe participation in the NFIP for each participant, as applicable, in accordance with NFIP regulatory requirements. The following information must be provided for each participant. - Adoption of NFIP minimum floodplain management criteria via local regulation. - Adoption of the latest effective Flood Insurance Rate Map (FIRM), if applicable. - Implementation and enforcement of local floodplain management regulations to regulate and permit development in SFHAs. - Appointment of a designee or agency to implement the addressed commitments and requirements of the NFIP. - Description of how participants implement the substantial improvement/substantial damage provisions of their floodplain management regulations after an event. Simply stating, "The community will continue to comply with the NFIP" is not sufficient to meet the requirement. Jurisdictions not currently participating in the NFIP, where a Flood Hazard Boundary Map or FIRM has been issued, may meet this requirement by describing why the community does not participate in the NFIP. <i>For jurisdictions that voluntarily participate in the CRS, it is highly recommended that this description also include related activities and address any issues raised during community assistance and monitoring activities.</i>

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
C3. Does the plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement 44 CFR § 201.6(c)(3)(i))	
a. The plan must include general hazard mitigation goals that represent what the jurisdiction(s) seeks to accomplish through mitigation plan implementation. <i>Goals are broad policy statements that explain what is to be achieved.</i> b. The goals must be consistent with the hazards identified in the plan.	C3-a. The plan must include goals to reduce the risk of the identified hazards. The goals must be consistent with the hazards identified in the plan. Goals may be presented as general statements applying to more than one hazard, or they may be itemized to each of the identified hazards. Goals are broad, long-term policy and vision statements that explain what is to be achieved by implementing the mitigation strategy.
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))	
a. The plan must include a mitigation strategy that 1) analyzes actions and/or projects that the jurisdiction considered to reduce the impacts of hazards identified in the risk assessment, and 2) identifies the actions and/or projects that the jurisdiction intends to implement. <i>Mitigation actions and projects means a hazard mitigation action, activity or process (for example, adopting a building code) or it can be a physical project (for example, elevating structures or retrofitting critical infrastructure) designed to reduce or eliminate the long term risks from hazards. This sub-element can be met with either actions or projects, or a combination of actions and projects.</i> The mitigation plan may include non-mitigation actions, such as actions that are emergency response or operational preparedness in nature. These will not be accepted as hazard mitigation actions, but neither will FEMA require these to be removed from the plan prior to approval. <i>A comprehensive range consists of different hazard mitigation alternatives that address the vulnerabilities to the hazards that the jurisdiction(s) determine are most important.</i> b. Each jurisdiction participating in the plan must have mitigation actions specific to that jurisdiction	C4-a. The mitigation strategy must include an analysis of a comprehensive range of actions or projects that the participants considered to specifically address vulnerabilities identified in the risk assessment. Actions considered must emphasize reducing risk to existing buildings, structures and infrastructure, as well as limiting risk to new development and redevelopment. The range of actions considered should include mitigation actions that benefit underserved communities and socially vulnerable populations. It is important for all actions considered to be documented, be as specific as possible, and be clearly linked to the vulnerabilities and impacts identified in the risk assessment. This includes actions for alleviating data deficiencies or building up capabilities related to mitigation implementation. Documenting all ideas provides a record of what actions were considered, and why. Additionally, this creates a list of actions that can be reconsidered as conditions change. Analyzing a comprehensive range means considering mitigation alternatives spanning all types of solutions. These may include local plans and regulations, structure and infrastructure projects, natural systems protection, and education and awareness programs. This analysis helps a jurisdiction select actions based on its own capabilities, as well as the social, technical and economic feasibility of the action.

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
that are based on the community's risk and vulnerabilities, as well as community priorities. c. The action plan must reduce risk to existing buildings and infrastructure as well as limit any risk to new development and redevelopment. <i>With emphasis on new and existing building and infrastructure means that the action plan includes a consideration of actions that address the built environment.</i>	A mitigation action is a measure, project, plan or activity proposed to reduce current and future vulnerabilities described in the risk assessment. C4-b. Each plan participant must identify one or more mitigation actions the participant(s) intends to implement for each hazard addressed in the risk assessment. The actions must be achievable and demonstrate how the mitigation activities reduce the risks identified in the risk assessment. The actions may apply to physical infrastructure, as well as the populations within the planning area. Actions may apply to one or more participants, as long as each participant is clearly associated with one or more actions. Non-mitigation actions can be included in a plan but will not be considered as part of the mitigation action requirement. These include actions that do not contribute to a long-term solution for the problem they are intended to address. Plan updates may validate and include previously included actions if those actions are being reconsidered for implementation to reduce the risks of identified hazards in the plan's current risk assessment.
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))	
a. The plan must describe the criteria used for prioritizing implementation of the actions. b. The plan must demonstrate when prioritizing hazard mitigation actions that the local jurisdictions considered the benefits that would result from the hazard mitigation actions versus the cost of those actions. The requirement is met as long as the economic considerations are summarized in the plan as part of the community's analysis. A complete benefit-cost analysis is not required. Qualitative benefits (for example, quality of life, natural and beneficial values, or other "benefits") can also be included in how actions will be prioritized. c. The plan must identify the position, office, department, or agency responsible for	C5-a. The plan must describe the criteria used for prioritizing the implementation of the actions. The criteria must include an emphasis on the extent to which benefits are maximized, in relation to the associated costs of the action. Although a full benefit-cost analysis is not necessary, the plan must demonstrate that proposed mitigation actions will be prioritized by weighing the cost of the action versus the benefits the action will produce, in addition to other prioritization factors. Another example of a prioritization method may be that jurisdictions establish a minimum threshold for the dollar amount, types or number of benefits an action must have to be considered for implementation. Or they could simply prioritize actions with more benefits than other alternatives.

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
implementing and administering the action (for each jurisdiction), and identify potential funding sources and expected timeframes for completion.	<i>Other methodologies are acceptable if the plan demonstrates that the action's monetary and non-monetary benefits were specifically emphasized and considered in the community's decision-making process. Qualitative benefits (quality of life, natural and beneficial values, etc.) may be used, especially in considering mitigation actions that alleviate long-term risk from future conditions, including climate change, and benefit underserved communities.</i> C5-b. The action plan must identify who is responsible for administering each action, along with the action's potential funding sources and expected time frames for completion. The plan must provide the position, office, department or agency responsible for implementing/administrating the identified mitigation actions. Names are not required, but the plan must provide enough detail for users to determine who within the jurisdiction will implement or administer the mitigation action. <i>The plan must identify applicable potential funding sources, with details beyond generic terms such as "federal," "state" and/or "local." The identified funding sources must be relevant to implementing the associated actions.</i> <i>The plan must identify expected time frames for completion. General terms like "short-term," "medium-term" and "long-term" must be defined. "Ongoing" is acceptable when used appropriately (e.g., for multi-phased projects).</i>

Element D: Plan Maintenance (Formerly Plan Review, Evaluation, and Implementation)

Element D reflects plan review, evaluation, and implementation in the 2011 PRT but reflects plan maintenance in the 2022 PRT.

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
D1 (formerly A5). Is there discussion of how each community will continue public participation in the plan maintenance process? (Requirement 44 CFR § 201.6(c)(4)(iii)) a. The plan must describe how the jurisdiction(s) will continue to seek public participation after the plan has been approved and during the plan's implementation, monitoring and evaluation.	D1-a. The plan must describe how the participant(s) will continue to seek public participation after the plan has been approved and during the plan's implementation, monitoring, and evaluation.

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
<u>Participation</u> means engaged and given the chance to provide feedback. Examples include, but are not limited to, periodic presentations on the plan's progress to elected officials, schools or other community groups, annual questionnaires or surveys, public meetings, postings on social media and interactive websites.	<i>The plan may contain a narrative description or an itemized list of steps, demonstrating the prescribed method that will be followed to obtain future public participation.</i> <i>Special consideration should be given to identifying and using unique and meaningful ways to keep the public engaged in the process.</i> <i>Examples include, but are not limited to: periodic presentations on the plan's progress to elected officials, schools or other community groups; annual questionnaires or surveys; public meetings; postings on social media; and interactive websites.</i>
D2 (formerly A6). 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))	
a. The plan must identify how, when, and by whom the plan will be monitored. <u>Monitoring</u> means tracking the implementation of the plan over time. For example, monitoring may include a system for tracking the status of the identified hazard mitigation actions. b. The plan must identify how, when, and by whom the plan will be evaluated. <u>Evaluating</u> means assessing the effectiveness of the plan at achieving its stated purpose and goals. c. The plan must identify how, when, and by whom the plan will be updated. <u>Updating</u> means reviewing and revising the plan at least once every five years. d. The plan must include the title of the individual or name of the department/agency responsible for leading each of these efforts.	D2-a. The plan must identify how, when and by whom the plan will be tracked for implementation over its five-year cycle (monitoring). <i>Monitoring may be described by including a narrative description or an itemized list of steps demonstrating the prescribed method that will be followed to monitor the plan after plan approval and during the plan's implementation.</i> Monitoring means tracking the implementation of the plan over time. For example, monitoring may include a system for tracking the status of the identified hazard mitigation actions. D2-b. The plan must identify how, when and by whom the plan will be assessed for effectiveness at achieving its stated purpose and goals (evaluating). <i>The evaluation method may be described by including a narrative description or an itemized list of steps demonstrating the prescribed method that will be followed to evaluate the plan after plan approval and during the plan's implementation, and prior to the plan's update.</i> Evaluating means assessing the effectiveness of the plan at achieving its stated purpose and goals. D2-c. The plan must identify how, when and by whom the plan will be reviewed and revised at least once every five years (updating). <i>The update method may be described by including a narrative description or an itemized list of steps that will be followed to update the plan prior to</i>

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
	resubmission for approval and during the plan's implementation. Updating means reviewing and revising the plan at least once every five years.
D3 (formerly C6). 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))	
a. The plan must describe the community's process to integrate the data, information, and hazard mitigation goals and actions into other planning mechanisms. b. The plan must identify the local planning mechanisms where hazard mitigation information and/or actions may be incorporated. <i>Planning mechanisms means governance structures that are used to manage local land use development and community decision-making, such as comprehensive plans, capital improvement plans, or other long-range plans.</i> c. A multi-jurisdictional plan must describe each participating jurisdiction's individual process for integrating hazard mitigation actions applicable to their community into other planning mechanisms. d. The updated plan must explain how the jurisdiction(s) incorporated the mitigation plan, when appropriate, into other planning mechanisms as a demonstration of progress in local hazard mitigation efforts. e. The updated plan must continue to describe how the mitigation strategy, including the goals and hazard mitigation actions will be incorporated into other planning mechanisms.	D3-a. The plan must describe the community's process to integrate the plan's data, information, and hazard mitigation goals and actions into other planning mechanisms. Integrate means to include hazard mitigation principles, vulnerability information and mitigation actions into other existing community planning to leverage activities that have co-benefits, reduce risk and increase resilience. Planning mechanisms refers to the governance structures used to manage local land use development and community decision-making, such as budgets, comprehensive plans, capital improvement plans, economic development strategies, climate action plans or other long-range plans. D3-b. The plan must identify the local planning mechanisms where hazard mitigation information/ actions may be integrated. The identified list of planning mechanisms must be applicable to the plan participant(s) and not contradict the identified capabilities. D3-c. A multi-jurisdictional plan must describe each participant's individual process for integrating information from the mitigation strategy into their identified planning mechanisms. <i>This element may be met with a general narrative description if the process is applicable to each of the plan participants; however, any participant who cannot apply the same process as other plan participants must include their unique process for integration.</i>

Element E: Plan Update

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
E1 (formerly D1). Was the plan revised to reflect changes in development? (Requirement 44 CFR § 201.6(d)(3)) a. The plan must describe changes in development that have occurred in hazard prone areas and increased or decreased the vulnerability of each jurisdiction since the last plan was approved. If no changes in development impacted the jurisdiction's overall vulnerability, plan updates may validate the information in the previously approved plan. <i>Changes in development</i> means recent development (for example, construction completed since the last plan was approved), potential development (for example, development planned or under consideration by the jurisdiction), or conditions that may affect the risks and vulnerabilities of the jurisdictions (for example, climate variability, declining populations or projected increases in population, or foreclosures). Not all development will affect a jurisdiction's vulnerability.	E1-a. The plan must describe changes in development that have occurred in hazard-prone areas and how they have increased or decreased the vulnerability of each jurisdiction since the previous plan was approved. If no development changes affected the jurisdiction's overall vulnerability, this must be stated with the plan. Changes in development means recent development (for example, construction completed since the last plan was approved), potential development (for example, development planned or under consideration by the jurisdiction), or conditions that may affect the risks and vulnerabilities of the jurisdictions (for example, climate change, declining populations or projected increases in population, or foreclosures) or shifts in the needs of underserved communities or gaps in social equity. This can also include changes in local policies, standards, codes, regulations, land use regulations and other conditions.
E2 (formerly, D3-a, B2-a, and C6-d). Was the plan revised to reflect changes in priorities and progress in local mitigation efforts? (Requirement 44 CFR § 201.6(d)(3)) D3-a. The plan must describe if and how any priorities changed since the plan was previously approved. If no changes in priorities are necessary, plan updates may validate the information in the previously approved plan. D2-a. The plan must describe the status of hazard mitigation actions in the previous plan by identifying those that have been completed or not completed. For actions that have not been completed, the plan must either describe whether the action is no longer relevant or be included as part of the updated action plan. C6-d. The updated plan must explain how the jurisdiction(s) incorporated the mitigation plan, when appropriate, into other planning mechanisms as a demonstration of progress in local hazard mitigation efforts.	E2-a. The plan must describe how it was revised due to a change in priorities for each jurisdiction. This can be done as a narrative or with detailed statements in the appropriate sections of the plan. The priorities to be considered are defined by the participant(s). If the participant(s) has no change in priorities since the last approval of the mitigation plan, this must be stated. E2-b. The plan must describe the status of all hazard mitigation actions in the previous plan by identifying whether they have been completed or not, for each jurisdiction. For actions that are not complete, the plan must state whether the action is no longer relevant or will be included in the updated action plan. E2-c. The updated plan must explain how the jurisdiction(s) integrated information from the mitigation plan into other planning mechanisms, as a demonstration of progress in local hazard mitigation efforts. If information from the previous plan was not integrated into other planning mechanisms, this must be stated.

Element F: Plan Adoption (formerly Element E of the 2011 PRT)

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
F1 (formerly E1). 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)) a. The plan must include documentation of plan adoption, usually a resolution by the governing body or other authority. If the local jurisdiction has not passed a formal resolution, or used some other documentation of adoption, the clerk or city attorney must provide written confirmation that the action meets their community’s legal requirements for official adoption and/or the highest elected official or their designee must submit written proof of the adoption. The signature of one of these officials is required with the explanation or other proof of adoption. Minutes of a council or other meeting during which the plan is adopted will be sufficient if local law allows meeting records to be submitted as documentation of adoption. The clerk of the governing body, or city attorney, must provide a copy of the law and a brief, written explanation such as, “in accordance with section ____ of the city code/ordinance, this constitutes formal adoption of the measure,” with an official signature. If adopted after FEMA review, adoption must take place within one calendar year of receipt of FEMA’s “Approval Pending Adoption.” See Section 5, <i>Plan Review Procedure</i> for more information on “Approvable Pending Adoption.”	F1-a. The jurisdiction must provide documentation of plan adoption, usually a resolution by the governing body or other authority, to receive approval. Documentation may be provided in the form of meeting minutes, resolutions, signed letter or any other method to demonstrate that official adoption by the participant has occurred. See Section 6, <i>Plan Review and Approval</i>, for more information on the process to adopt the plan after review by the state and FEMA.
F2 (formerly E2). 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)) a. Each jurisdiction that is included in the plan must have its governing body adopt the plan prior to FEMA approval, even when a regional agency has the authority to prepare such plans. As with single jurisdictional plans, in order for FEMA to give approval to a multi-jurisdictional plan, at least one participating jurisdiction must formally adopt the plan within one calendar year of FEMA’s designation of the plan as “Approvable Pending Adoption.” See Section 5, <i>Plan Review Procedure</i> for more information on “Approvable Pending Adoption.”	F2-a. To receive approval, the participants must adopt the plan and provide documentation that the adoption has occurred. Participants that submit their adoption documentation separately from the other multi-jurisdictional plan participants will not receive a new expiration date. Participating jurisdictions that adopt the plan more than one year after Approvable Pending Adoption (APA) status has been issued must either: Validate that their information in the plan remains current with respect to both the risk assessment (no recent hazard events, no changes in development)

2011 Local Mitigation Plan Review Guide	2022 Local Mitigation Planning Policy Guide (changes in yellow)
	and their mitigation strategy (no changes necessary); or Make the necessary updates before submitting the adoption resolution to FEMA.

Element G: High Hazard Potential Dams (Optional)

The 2022 Local Policy incorporates existing mitigation planning requirements for the Rehabilitation of High Hazard Potential Dams (HHPD) Grant Program. The policy expanded the types of dams that must be planned for from “eligible HHPDs” to all “HHPDs.” This change came from consultation with the National Dam Safety Review Board.

The table below compares the [2020 HHPD Grant Guidance](#) with the requirements established in the 2022 Local Mitigation Planning Policy Guide.

2020 HHPD Grant Guidance	2022 Local Mitigation Planning Policy Guide (changes in yellow)
HHPD1. Did the plan describe the incorporation of existing plans, studies, reports and technical information for HHPDs?	
To meet this requirement with a specific focus on eligible high hazard potential dams, the mitigation plan must include descriptions of: HHPD1-a: How the state dam safety agency coordinated with the jurisdiction and/or local dam owners. NOTE: Ensure sensitive and/or personally identifiable information is protected HHPD1-b: Information shared by the state and/or local dam owners. Examples may include: - Location and size of the PAR, as well as potential impacts to institutions and critical infrastructure/facilities/lifelines. - Inundation maps, emergency action plans, floodplain management plans, and/or data or summaries provided by dam breach modeling software such as HEC-RAS, DSS-WISE HCOM, DSS-WISE Lite, FLO-2D, as well as more detailed studies.	To meet this requirement with a specific focus on eligible HHPDs, the mitigation plan must include descriptions of: HHPD1-a: How the local government coordinated with local dam owners and/or the state dam safety agency. NOTE: Ensure sensitive and/or personally identifiable information is protected. HHPD1-b: Information shared by the state and/or local dam owners. Examples may include: - Location and size of the population at risk, as well as potential impacts to institutions and critical infrastructure/facilities/lifelines. - Inundation maps, emergency action plans, floodplain management plans and/or data or summaries provided by dam breach modeling software, such as HEC-RAS, DSS-WISE HCOM, DSS-WISE Lite, FLO-2D, as well as more detailed studies.

2020 HHPD Grant Guidance	2022 Local Mitigation Planning Policy Guide (changes in yellow)
HHPD2. Did the plan address HHPDs in the risk assessment?	
To meet this requirement with a specific focus on eligible HHPDs, the mitigation plan must: HHPD2-a: Describe the risks and vulnerabilities to and from eligible high hazard potential dams, including: ▪ Potential cascading impacts of storms, seismic events, landslides, wildfires, etc. on dams that might affect up and downstream flooding potential in terms of breach, non- breach, and residual risks. ▪ Potential significant economic, environmental, or social impacts as well as multi- jurisdictional impacts from a dam incident. ▪ Location and size of populations at risk from eligible HHPDs as well as potential impacts to institutions and critical infrastructure/facilities/lifelines. ▪ Methodology and/or assumptions for risk data and inundation modeling should be noted. HHPD2-b: Document limitations and describe the approach to address deficiencies.	To meet this requirement with a specific focus on HHPDs, the mitigation plan must: HHPD2-a: Describe the risks and vulnerabilities to and from eligible HHPDs, including: ▪ Potential cascading impacts of storms, seismic events, landslides, wildfires, etc. on dams that might affect upstream and downstream flooding potential. ▪ Potential significant economic, environmental or social impacts, as well as multi-jurisdictional impacts, from a dam incident. ▪ Location and size of populations at risk from HHPDs, as well as potential impacts to institutions and critical infrastructure/facilities/lifelines. ▪ Methodology and/or assumptions for risk data and inundation modeling. HHPD2-b: Document the limitations and describe the approach for addressing deficiencies.
HHPD3. Did the plan include mitigation goals to reduce long-term vulnerabilities from HHPDs?	
To meet this requirement with a specific focus on eligible high hazard potential dams, the mitigation plan must: HHPD3-a. Address a reduction in vulnerabilities to and from eligible high hazard potential dams as part of their own goals or with other long-term strategies. HHPD3-b. Link proposed actions to reducing long-term vulnerabilities consistent with the goals.	To meet this requirement with a specific focus on eligible HHPDs, the mitigation plan must: HHPD3-a: Address a reduction in vulnerabilities to and from HHPDs as part of its own goals or with other long-term strategies. The plan does not need to include a goal specific to HHPDs alone. HHPD3-b: Link proposed actions to reducing long-term vulnerabilities consistent with the goals.
HHPD4-a. Did the plan include actions that address HHPDs and prioritize mitigation actions to reduce vulnerabilities from HHPDs?	

2020 HHPD Grant Guidance	2022 Local Mitigation Planning Policy Guide (changes in yellow)
To meet this requirement with a specific focus on eligible high hazard potential dams, the mitigation plan must: HHPD4-a: Describe a range of specific actions, such as: ▪ Rehabilitating and/or removing dams. ▪ Adopting and enforcing land use ordinances in inundation zones. ▪ Acquiring and/or elevating structures, and/or acquiring easements in inundation zones. ▪ Flood protection, such as berms, floodwalls, or floodproofing, in inundation zones. HHPD4-b: Describe the criteria used for prioritizing actions related to eligible high hazard potential dams. HHPD4-c: Identify the position, office, department or agency responsible for implementing and administering the action related to mitigating hazards to or from eligible HHPDs high hazard potential dams.	To meet this requirement with a specific focus on eligible HHPDs, the mitigation plan must: HHPD4-a: Describe a range of specific actions, such as: ▪ Rehabilitating/removing dams. ▪ Adopting and enforcing land use ordinances in inundation zones. ▪ Elevating structures in inundation zones. ▪ Adding flood protection, such as berms, floodwalls or floodproofing, in inundation zones. HHPD4-b: Describe the criteria used for prioritizing actions related to eligible HHPDs. HHPD4-c: Identify the position, office, department or agency responsible for implementing and administering the action related to mitigating hazards to or from eligible HHPDs.

Element H: Additional State Requirements (Optional)

(Formerly Element F.) This space is for the state to include additional requirements.