

Your Mitigation Plan



FAQs

FAQs for submittal of Local Mitigation Action Plans starting May 31, 2010

Why the Two-County Policy? Are plan reviewers not accepting regional plans anymore?

The two county maximum is a new TDEM policy created in response to a growing concern. Regional plans create a cumbersome, unmanageable system whenever the magnitude of the plan expands with the area size. By restricting each plan to a limited area, TDEM believes the local jurisdictions will retain more ownership of their plan. As the boundaries of the planning area shrink, the more commonality the jurisdictions will find among its hazards. Jurisdictions can control smaller plans better and wouldn't be penalized by underperforming participants during the planning cycle, updates, review schedules and FEMA approval.

Likewise, the regional authority should adopt one of the plans, ideally the one its facilities are located within, in order to remain eligible for mitigation grants. Many regional authorities have already embraced the smaller area planning approach.

Won't this Two-County Policy change our planning process immensely?

TDEM continues to encourage mutual cooperation and communications at the regional level. The larger regional planning meetings would then break into smaller planning groups of the one to two counties (with incorporated cities) according to shared interests and risks.

General planning knowledge of regional issues remains important since we know hazards and resultant actions do not always stop at political borders.

Hazard assessments can be developed across the greater regional planning area. Each smaller planning area must extract those hazards that affect their area and address its community's unique extent, probability, location, vulnerability and impact whenever it differs from the region as a whole. Otherwise, the plan will not reflect true risks to the community. Likewise, the regional planning area can identify and prioritize action items in order to better capture hazard mitigation grant funds. Again, the smaller planning areas should address these actions by adding or subtracting to them according to their communities' identified hazards and desired mitigation outcomes. Each planning area will need to conduct its own outreach activities.

Doesn't that mean our planners would need to start from scratch and take longer to complete a plan?

Updates should be fresh documents. Each section needs to be reviewed and updated for current relevance regardless. Jurisdictions should still count on 6-12 months to complete their plan and six months for TDEM and FEMA reviews.

The mitigation plan does not need to be a highly technical document. From TDEM's standpoint, using software such as Hazards United States (HAZUS), for mapping and extensive quantitative valuation breakdowns are encouraged -- if the community has the resources. If not, other resources usually give adequate background information and there are various agency websites, including the Texas Hazard Mitigation Package, or THMP, created by the Texas Geographic Society. THMP is an online tool for identify the location of natural hazards in your jurisdiction. This tool was partially funded by the Hazard Mitigation Grant Program (HMGP) and is available at no cost to local jurisdictions. THMP may be viewed at www.THMP.info

What are the updates that are required and must be performed in order for FEMA to accept the plan?

The required activities are covered by two tools: (1) the FEMA local Mitigation Plans Guidance found at <http://www.fema.gov/library/viewRecord.do?id=3336> and (2) the local mitigation plan crosswalk. The Guidance interprets the 44 CFR requirements for local mitigation plans. The crosswalk can be considered the score card for meeting those requirements. In the FEMA Guidance, take note of what *Must/Shalls* cover and what *Shoulds* cover. Satisfy the *Must/Shalls* to the fullest extent. Expanding on *Shoulds* will not substitute if *Must/Shalls* are found deficient.

Several major components are required to be addressed, regardless of whether you are submitting a first, or an updated, mitigation action plan.

The main components of a mitigation plan are:

1. **Planning Process:** Documentation of your updating process, i.e., introduction of new participants or brief notation of participants who have dropped from the current plan. Also document all meetings, public outreach, outreach to additional stakeholders, and the incorporation of other planning devices into the updated plan. The planning process must be new information based on the steps taken throughout the update process.
2. **Risk Assessment:** Any change in hazards determined to pose a threat to your community is evaluated relating to history of occurrence, extent, probability, vulnerability and impact.
3. **Mitigation Strategy:** Both the status of action items from the current plan and the addition of new action items to fulfill the comprehensive range requirement are evaluated. Make sure your actions are mitigation activities and not preparedness activities.
4. **Plan Maintenance:** Ongoing maintenance is often neglected, leaving many jurisdictions vulnerable because their plan expires without an Update ready due to lack of review on a regular basis. Also, many plans are too technical, leaving them difficult to understand and put into action. This defeats the purpose of the plan as an effective mitigation tool. The goal should be a small, easy to understand, easy to update plan with "hands on" local involvement.
5. **New (as of 10/2008):** NFIP participation and compliance narrative and repetitive loss properties descriptions are evaluated.

What sections must be reviewed to meet the update requirements?

All sections must be reviewed. This process must be documented in terms of who and what, and whether updated information was required or if the current information stands.

Must a jurisdiction have a FEMA approved mitigation plan in order to receive FEMA assistance? In other words, can they have a Mitigation plan that is not FEMA approved and receive assistance from FEMA in a disaster?

Under the extraordinary circumstances provision for small and impoverished communities, a community may apply for HMGP grants and be funded if the plan is completed within 12 months. Also, jurisdictions may apply for HMGP while their plan is in the draft status, but the submitted application will be scored accordingly in this case. For Pre-Disaster Mitigation (PDM), Severe Repetitive Loss (SRL) and Flood Mitigation Assistance (FMA) grants, a plan must be current at the time of application deadline. For Repetitive Flood Claims (RFC) grants, no local mitigation plan is required by FEMA.

You mentioned that there is no ability to extend the current mitigation plan—that when it is up that is it. This would leave our jurisdictions in a precarious situation if they should need FEMA assistance within the next few months. We are coming into our Flood season and hurricane season. Is there no recourse for this--such as in the process of updating the plan?

Federal disaster assistance eligibility for Individual Assistance and Public Assistance is not dependent on a local mitigation plan. As mentioned above, there is an extraordinary circumstances provision for small and impoverished communities to apply and be funded for HMGP grants. Also, jurisdictions may apply for HMGP while their plan is in the draft status, but the submitted application will be scored accordingly in this case.

How do I submit a plan to the State for review?

Plan should be submitted in (1) hardcopy and CD. Neither TDEM nor FEMA will review electronic-only copies of submittals. Each submittal should include a crosswalk filled out by the plan writer indicating the page(s) each item can be found. If the plan needs revisions, the plan writer will receive a crosswalk with comments as to where and how to address deficiencies. On subsequent revisions, this crosswalk should be answered and notations to pages on which the item is addressed should be added. The revisions should be highlighted in the document. The plan and crosswalk should be again resubmitted in hard copy and CD. When the plan has been designated "approved pending adoption" a finalized version with all highlights removed and a CD that exactly matches the hardcopy should be submitted. At least one jurisdiction must have adopted the plan for it to be approved. All other jurisdictions should plan on adopting within three months. Any jurisdiction that does not complete the adoption process is not eligible for the Hazard Mitigation Assistance (HMA) grants, with the exception of RFC.