

LOCAL MITIGATION PLAN REVIEW SUMMARY

The plan cannot be approved if the plan has not been formally adopted. Each requirement includes separate elements. All elements of the requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a score of "Satisfactory." Elements of each requirement are listed on the following pages of the Plan Review Crosswalk. A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing. Reviewer's comments must be provided for requirements receiving a "Needs Improvement" score.

Prerequisite(s) (Check Applicable Box)	NOT MET	MET
1. Adoption by the Local Governing Body: §201.6(c)(5) OR		N/A
2. Multi-Jurisdictional Plan Adoption: §201.6(c)(5) AND	X	
3. Multi-Jurisdictional Planning Participation: §201.6(a)(3)	X	
Planning Process	N	S
4. Documentation of the Planning Process: §201.6(b) and §201.6(c)(1)		X
Risk Assessment	N	S
5. Identifying Hazards: §201.6(c)(2)(i)		X
6. Profiling Hazards: §201.6(c)(2)(i)	X	
7. Assessing Vulnerability: Overview: §201.6(c)(2)(ii)	X	
8. Assessing Vulnerability: Addressing Repetitive Loss Properties: §201.6(c)(2)(ii)		X
9. Assessing Vulnerability: Identifying Structures, Infrastructure, and Critical Facilities: §201.6(c)(2)(ii)(B)		N/A
10. Assessing Vulnerability: Estimating Potential Losses: §201.6(c)(2)(ii)(B)		X
11. Assessing Vulnerability: Analyzing Development Trends: §201.6(c)(2)(ii)(C)		X
12. Multi-Jurisdictional Risk Assessment: §201.6(c)(2)(iii)		X

*States that have additional requirements can add them in the appropriate sections of the *Local Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

SCORING SYSTEM

Please check one of the following for each requirement.

N – Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

S – Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Mitigation Strategy

- 13. Local Hazard Mitigation Goals: §201.6(c)(3)(i)
- 14. Identification and Analysis of Mitigation Actions: §201.6(c)(3)(ii)
- 15. Identification and Analysis of Mitigation Actions: NFIP Compliance: §201.6(c)(3)(ii)
- 16. Implementation of Mitigation Actions: §201.6(c)(3)(iii)
- 17. Multi-Jurisdictional Mitigation Actions: §201.6(c)(3)(iv)

	N	S
13. Local Hazard Mitigation Goals: §201.6(c)(3)(i)		X
14. Identification and Analysis of Mitigation Actions: §201.6(c)(3)(ii)		X
15. Identification and Analysis of Mitigation Actions: NFIP Compliance: §201.6(c)(3)(ii)	X	
16. Implementation of Mitigation Actions: §201.6(c)(3)(iii)		X
17. Multi-Jurisdictional Mitigation Actions: §201.6(c)(3)(iv)		X

Plan Maintenance Process

- 18. Monitoring, Evaluating, and Updating the Plan: §201.6(c)(4)(ii)
- 19. Incorporation into Existing Planning Mechanisms: §201.6(c)(4)(ii)
- 20. Continued Public Involvement: §201.6(c)(4)(iii)

	N	S
18. Monitoring, Evaluating, and Updating the Plan: §201.6(c)(4)(ii)	X	
19. Incorporation into Existing Planning Mechanisms: §201.6(c)(4)(ii)		X
20. Continued Public Involvement: §201.6(c)(4)(iii)		X

Additional State Requirements*

- Insert State Requirement
- Insert State Requirement
- Insert State Requirement

	N	S
Insert State Requirement		N/A
Insert State Requirement		N/A
Insert State Requirement		N/A

LOCAL MITIGATION PLAN APPROVAL STATUS

PLAN NOT APPROVED

See Reviewer's Comments

PLAN APPROVED

Jurisdiction: Jefferson County Washington & the City of Port Townsend

Local Mitigation Plan Review and Approval Status

Jurisdiction: Jefferson County & the City of Port Townsend	Title of Plan: Natural Hazard Mitigation Plan	Date of Plan: November 2009
Local Point of Contact: Bob Hamlin	Address: Jefferson County Department of Emergency Management 81 Elkins Road Port Hadlock, WA 98339	
Title: Program Manager		
Agency: Jefferson County Department of Emergency Management		
Phone Number: (360) 385-9368	E-Mail: bhamlin@co.jefferson.wa.us	

State Reviewer: Bev O’Dea	Title: Mitigation Strategist	Date: 1/8/10
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FEMA Reviewer: Brett Holt	Title: Mitigation Planner	Date: February 16, 2010
Date Received in FEMA Region X	January 14, 2010	
Plan Not Approved	February 24, 2010	
Plan Approved		
Date Approved		

Jurisdiction:	NFIP Status*			
	Y	N	N/A	CRS Class
1. Jefferson County	X			
2. City of Port Townsend	X			
3. Port Ludlow Drainage District			X	
4. Jefferson County Fire District 1: East Jefferson Fire & Rescue			X	
5. Jefferson County Fire District 2			X	
6. Jefferson County Fire District 3: Port Ludlow Fire & Rescue			X	

LOCAL HAZARD MITIGATION PLAN REVIEW CROSSWALK**FEMA REGION X**

Jurisdiction: Jefferson County Washington & the City of Port Townsend

7. Jefferson County Fire District 4: Brinnon Fire Department			X	
8. Jefferson County Fire District 5			X	
9. Public Utility District No. 1 of Jefferson County			X	
10. Public Hospital District No. 2			X	
11. Jefferson County Library District			X	
12. Port of Port Townsend			X	
13. Port Townsend School District No. 50			X	
14. Port Townsend School District No. 45			X	
15. Chimacum School District No. 20			X	
16. Queets/Clearwater School District No. 20			X	
17. Quilcene School District No. 48			X	
18. Quillayute Valley School District No. 402			X	

*** Notes:****Y = Participating****N = Not Participating****N/A = Not Mapped**

Note: FEMA- required changes made to the document are identified in RED in the "Location in the Plan" column of the following pages.

PREREQUISITE(S)

1. Adoption by the Local Governing Body

Requirement §201.6(c)(5): [The local hazard mitigation plan **shall** include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council).

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Has the local governing body adopted new or updated plan?	N/A			N/A
B. Is supporting documentation, such as a resolution, included?	N/A			N/A
SUMMARY SCORE				N/A

2. Multi-Jurisdictional Plan Adoption

Requirement §201.6(c)(5): For multi-jurisdictional plans, each jurisdiction requesting approval of the plan **must** document that it has been formally adopted.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Does the new or updated plan indicate the specific jurisdictions represented in the plan?	p. 74	The participating jurisdictions are indicated.		X
B. For each jurisdiction, has the local governing body adopted the new or updated plan?	p. 74	Pending FEMA review.	X	
C. Is supporting documentation, such as a resolution, included for each participating jurisdiction?	p. 74	Adoption resolutions will be provided following FEMA review.	X	
SUMMARY SCORE			X	

3. Multi-Jurisdictional Planning Participation

Requirement §201.6(a)(3): Multi-jurisdictional plans (e.g., watershed plans) may be accepted, as appropriate, as long as each jurisdiction has participated in the process ... Statewide plans will not be accepted as multi-jurisdictional plans.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Does the new or updated plan describe how each jurisdiction participated in the plan's development?	pp. 67-68	The plan describes how each jurisdiction participated.		X
B. Does the updated plan identify all participating jurisdictions, including new, continuing, and the jurisdictions that no longer participate in the plan?	p. 74 Added "2004" column & additional detail.	It's clear if a jurisdiction is not participating; however, the plan does not clearly state which jurisdictions are new or continuing in the 2010 update. Required Revision (Feb. 2010): Update the table on page 74 to clearly state if the jurisdictions are new or continuing to participate in the plan.	X	
SUMMARY SCORE			X	

PLANNING PROCESS: §201.6(b): *An open public involvement process is essential to the development of an effective plan.*

4. Documentation of the Planning Process

Requirement §201.6(b): *In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process shall include:*

- (1) *An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval;*
- (2) *An opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development, as well as businesses, academia and other private and non-profit interests to be involved in the planning process; and*
- (3) *Review and incorporation, if appropriate, of existing plans, studies, reports, and technical information.*

Requirement §201.6(c)(1): *[The plan shall document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan provide a narrative description of the process followed to prepare the new or updated plan?	pp. 65-73	A narrative of the planning process is provided.		X
B. Does the new or updated plan indicate who was involved in the current planning process? (For example, who led the development at the staff level and were there any external contributors such as contractors? Who participated on the plan committee, provided information, reviewed drafts, etc.?)	Appendix C, pp. 466 - 486	A list of organizations and specific individuals is provided.		X
C. Does the new or updated plan indicate how the public was involved? (Was the public provided an opportunity to comment on the plan during the drafting stage and prior to the plan approval?)	pp. 67 – 68; 71 – 73; pp. 490-492, Appendix D	A public involvement was provided throughout the County. Specific meetings with Councils and organizations were held. Over 160 people were involved in the plan's development.		X
D. Does the new or updated plan discuss the opportunity for neighboring communities, agencies, businesses, academia, nonprofits, and other interested parties to be involved in the planning process?	pp. 406 – 427, 487 - 524	Opportunities for other interested parties to contribute to the plan were provided.		X
E. Does the planning process describe the review and incorporation, if appropriate, of existing plans, studies, reports, and technical information?	p. 68, Appendix D	A list of resources is provided.		X
F. Does the updated plan document how the planning team reviewed and analyzed each section of the plan and whether each section was revised as part of the update process?	pp. 2-7	Revisions/updates to the plan are noted.		X
SUMMARY SCORE				X

Jurisdiction: Jefferson County Washington & the City of Port Townsend

RISK ASSESSMENT: §201.6(c)(2): *The plan shall include a risk assessment that provides the factual basis for activities proposed in the strategy to reduce losses from identified hazards. Local risk assessments must provide sufficient information to enable the jurisdiction to identify and prioritize appropriate mitigation actions to reduce losses from identified hazards.*

5. Identifying Hazards

Requirement §201.6(c)(2)(i): *[The risk assessment shall include a] description of the type ... of all natural hazards that can affect the jurisdiction.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan include a description of the types of all natural hazards that affect the jurisdiction?	pp. 96 - 157	The plan includes a description of the types of hazard that affect the jurisdiction.		X
SUMMARY SCORE				X

6. Profiling Hazards

Requirement §201.6(c)(2)(i): *[The risk assessment shall include a] description of the ... location and extent of all natural hazards that can affect the jurisdiction. The plan shall include information on previous occurrences of hazard events and on the probability of future hazard events.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the risk assessment identify the location (i.e., geographic area affected) of each natural hazard addressed in the new or updated plan?	pp. 96 - 157 p. 134a – added West Jefferson County inundation zone desc.	The location of each natural hazard is provided except for those noted below. Required Revision (Feb. 2010): Describe the inundation zone of a tsunami for western Jefferson County. Recommended Revision (Feb. 2010): Consider updating all the maps that are statewide to be focused on the county. For example, the “Areas Most Vulnerable to Landslide” map on page 188 is very general and doesn't provide detail about the areas vulnerable to landslides in the county.	X	
B. Does the risk assessment identify the extent (i.e., magnitude or severity) of each hazard addressed in the new or updated plan?	pp. 96 - 157	The extent of each natural hazard is addressed.		X
C. Does the plan provide information on previous occurrences of each hazard addressed in the new or updated plan?	pp. 96 - 157	Previous occurrences of each natural hazard are addressed. Federal disaster declarations are listed, as well as all local disasters. (pp. 83-86) Recommended Revision (Feb. 2010): Consider including additional detail such as specific areas in the county affected by the event, economic impact, and damages to buildings.		X

Jurisdiction: Jefferson County Washington & the City of Port Townsend

<p>D. Does the plan include the probability of future events (i.e., chance of occurrence) for each hazard addressed in the new or updated plan?</p>	<p>pp. 96 - 157</p> <p>p.96a – added description of hazard rating process.</p> <p>Added “Natural Hazard Risk Rating” for each of the required hazards based on scores from p.225.</p> <p>Corrected page numbers.</p>	<p>The probability of future events if provided for all natural hazards except those noted below.</p> <p>Required Revision (Feb. 2010): The terms “low, medium/moderate, and high” need to be defined for each of the following hazard.</p> <ul style="list-style-type: none"> • Avalanche (p. 97) • Drought (p. 102) • Floods (p. 113) • Heatwave (p. 113 The plan page numbers are incorrect) • Landslide (p. 116) • Tornado (p. 129) • Tsunami/Seiche (p. 132) <p>This requirement can be met by showing the scores used on page 225. For the Probability of Occurrence criteria, list what each jurisdiction identified and this would quantify/define the probability of future events for the hazards listed above.</p>	<p>X</p>	
SUMMARY SCORE			<p>X</p>	

7. Assessing Vulnerability: Overview

Requirement §201.6(c)(2)(ii): [The risk assessment **shall** include a] description of the jurisdiction’s vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description **shall** include an overall summary of each hazard and its impact on the community.

Element	Location in the Plan (section or annex and page #)	Reviewer’s Comments	SCORE	
			N	S
<p>A. Does the new or updated plan include an overall summary description of the jurisdiction’s vulnerability to each hazard?</p>	<p>pp. 96 - 157</p>	<p>An overall vulnerability assessment is provided for each natural hazard.</p> <p>Recommended Revision (Feb. 2010): The Natural Hazard Rating table on page 225 is a useful tool to see what hazards are of concern to each jurisdiction. For each jurisdiction, consider showing the actual scores, rather than just total, for ‘Probability of Occurrence’, ‘Impact Area’, ‘Health and Safety’, ‘Property’, ‘Environment’, and ‘Economic’. This would provide a better understanding of the impacts to each jurisdiction based on the different hazards.</p>		<p>X</p>
<p>B. Does the new or updated plan address the impact of each hazard on the jurisdiction?</p>	<p>pp. 96 - 157</p> <p>pp. 134a and 134b</p>	<p>The impact of each hazard is provided.</p> <p>Required Revision (Feb. 2010): Tsunami: Describe areas along the coast/highway 101 that may be impacted by a tsunami.</p>	<p>X</p>	
SUMMARY SCORE			<p>X</p>	

8. Assessing Vulnerability: Addressing Repetitive Loss Properties

Requirement §201.6(c)(2)(ii): *[The risk assessment] must also address National Flood Insurance Program (NFIP) insured structures that have been repetitively damaged floods.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe vulnerability in terms of the types and numbers of repetitive loss properties located in the identified hazard areas?	pp. 114 - 115	Repetitive loss properties are addressed for the county and Port Townsend.		X
SUMMARY SCORE				X

9. Assessing Vulnerability: Identifying Structures

Requirement §201.6(c)(2)(ii)(A): *The plan should describe vulnerability in terms of the types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard area*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe vulnerability in terms of the types and numbers of existing buildings, infrastructure, and critical facilities located in the identified hazard areas?	pp. 245-246	Critical facilities are identified.		X
B. Does the new or updated plan describe vulnerability in terms of the types and numbers of future buildings, infrastructure, and critical facilities located in the identified hazard areas?	N/A	N/A		N/A
SUMMARY SCORE				N/A

10. Assessing Vulnerability: Estimating Potential Losses

Requirement §201.6(c)(2)(ii)(B): *[The plan should describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(ii)(A) of this section and a description of the methodology used to prepare the estimate*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan estimate potential dollar losses to vulnerable structures?	pp. 239-244; 279-282 305-369	The estimated potential dollar losses to vulnerable structures if provided.		X
B. Does the new or updated plan describe the methodology used to prepare the estimate?	p.223	The methodology is provided.		X
SUMMARY SCORE				X

11. Assessing Vulnerability: Analyzing Development Trends

Requirement §201.6(c)(2)(ii)(C): *[The plan **should** describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe land uses and development trends?	pp. 79-82, 89-95, pp. 222-369	Land uses and development trends are described.		X
SUMMARY SCORE				X

12. Multi-Jurisdictional Risk Assessment

Requirement §201.6(c)(2)(iii): *For multi-jurisdictional plans, the risk assessment **must** assess each jurisdiction's risks where they vary from the risks facing the entire planning area.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan include a risk assessment for each participating jurisdiction as needed to reflect unique or varied risks?	pp. 224-370	Each participating has a risk assessment included in the plan.		X
SUMMARY SCORE				X

MITIGATION STRATEGY: §201.6(c)(3): *The plan shall include a mitigation strategy that provides the jurisdiction's blueprint for reducing the potential losses identified in the risk assessment, based on existing authorities, policies, programs and resources, and its ability to expand on and improve these existing tools.*

13. Local Hazard Mitigation Goals

Requirement §201.6(c)(3)(i): *[The hazard mitigation strategy **shall** include a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan include a description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards?	pp. 205-206	Five goals are included. These are the same as the 2004 plan.		X
SUMMARY SCORE				X

14. Identification and Analysis of Mitigation Actions

Requirement §201.6(c)(3)(ii): [The mitigation strategy **shall** include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan identify and analyze a comprehensive range of specific mitigation actions and projects for each hazard?	pp. 27-58	A range of actions for each hazard are provided. There are no new actions included in this plan.		X
B. Do the identified actions and projects address reducing the effects of hazards on new buildings and infrastructure?	pp. 27-58	A number of projects address reducing the effects of hazards on new buildings and infrastructure.		X
C. Do the identified actions and projects address reducing the effects of hazards on existing buildings and infrastructure?	pp. 27-58	A number of projects address reducing the effects of hazards on existing buildings and infrastructure.		X
SUMMARY SCORE				X

15. Identification and Analysis of Mitigation Actions: National Flood Insurance Program (NFIP) Compliance

Requirement: §201.6(c)(3)(ii): [The mitigation strategy] must also address the jurisdiction's participation in the National Flood Insurance Program (NFIP), and continued compliance with NFIP requirements, as appropriate.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe the jurisdiction (s) participation in the NFIP?	pp. 114-115, 229, 268 Added tables to p.229 and p.268 to summarize the data mentioned. Expanded the text to reflect CRS participation more accurately.	Jefferson County and Port Townsend participate in the NFIP. The plan provides some level of participation in the NFIP for these two jurisdictions; however, additional information needs to be included. Required Revision (Feb. 2010): For each participating jurisdiction, describe how they participate in the NFIP program. This may include, but it not limited to, total amount of paid claims, number of structures exposed to flood risk, year the community entered the NFIP, or if the Floodplain Ordinance meets or exceeds FEMA or State minimum requirements. Review the document at the end of this crosswalk (pp 13-16) for additional information that can be provided regarding participation in NFIP. Jefferson County does not officially participate in CRS and the plan should reflect this on page 268.	X	

Jurisdiction: Jefferson County Washington & the City of Port Townsend

B. Does the mitigation strategy identify, analyze and prioritize actions related to continued compliance with the NFIP?	pp. 44-46	The plan includes a list of strategies that demonstrate continued compliance with the NFIP. These include ST-FL-1, ST-FL-2, LT-FL-1, and LT-FL-2.		X
SUMMARY SCORE			X	

16. Implementation of Mitigation Actions

Requirement: §201.6(c)(3)(iii): [The mitigation strategy section **shall** include] an action plan describing how the actions identified in section (c)(3)(ii) will be prioritized, implemented, and administered by the local jurisdiction. Prioritization **shall** include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated mitigation strategy include how the actions are prioritized? (For example, is there a discussion of the process and criteria used?)	p. 214	The plan describes how the actions are prioritized.		X
B. Does the new or updated mitigation strategy address how the actions will be implemented and administered, including the responsible department, existing and potential resources and the timeframe to complete each action?	pp. 27-58	Each strategy describes how the actions will be implemented and administered.		X
C. Does the new or updated prioritization process include an emphasis on the use of a cost-benefit review to maximize benefits?	p. 214	An emphasis on the use of cost-benefit review is included.		X
D. Does the updated plan identify the completed, deleted or deferred mitigation actions as a benchmark for progress, and if activities are unchanged (i.e., deferred), does the updated plan describe why no changes occurred?	Exec Sum – p. 27-58	The updated plan identifies completed, deleted and deferred mitigation actions.		X
SUMMARY SCORE				X

17. Multi-Jurisdictional Mitigation Actions

Requirement §201.6(c)(3)(iv): For multi-jurisdictional plans, there **must** be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan include identifiable action items for each jurisdiction requesting FEMA approval of the plan?	pp. 27-58; pp. 370-404.	Each jurisdiction has identified at least one action item.		X
B. Does the updated plan identify the completed, deleted or deferred mitigation actions as a benchmark for progress, and if activities are unchanged (i.e., deferred), does the updated plan describe why no changes occurred?	pp. 27-58; pp. 370-404.	The updated plan identifies completed, deleted and deferred mitigation actions for each jurisdiction.		X
SUMMARY SCORE				X

PLAN MAINTENANCE PROCESS

18. Monitoring, Evaluating, and Updating the Plan

Requirement §201.6(c)(4)(i): [The plan maintenance process **shall** include a] section describing the method and schedule of monitoring, evaluating, and updating the mitigation plan within a five-year cycle.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe the method and schedule for monitoring the plan, including the responsible department?	p. 75	The plan describes how it will be monitored.		X
B. Does the new or updated plan describe the method and schedule for evaluating the plan, including how, when and by whom (i.e. the responsible department)?	p. 75 Added text to p.75 describing how each jurisdiction will participate. Caused reformat of p.76, too.	Required Revision (Feb. 2010): The plan describes how each jurisdiction will receive the annual report after the Natural Hazards Mitigation Planning Committee meets, but the plan does not describe how each jurisdiction will provide input annually. Each jurisdiction that is part of this plan must participate.	X	
C. Does the new or updated plan describe the method and schedule for updating the plan within the five-year cycle?	p. 76	The plan describes the method and schedule for updating the plan.		X
SUMMARY SCORE			X	

19. Incorporation into Existing Planning Mechanisms

Requirement §201.6(c)(4)(ii): [The plan **shall** include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan identify other local planning mechanisms available for incorporating the mitigation requirements of the mitigation plan?	pp. 232-370	Local planning mechanisms are identified for each participating jurisdiction.		X
B. Does the new or updated plan include a process by which the local government will incorporate the mitigation strategy and other information contained in the plan (e.g., risk assessment) into other planning mechanisms, when appropriate?	pp. 232-370	The plan includes a process to incorporate the actions/other information into other planning mechanisms.		X
C. Does the updated plan explain how the local government incorporated the mitigation strategy and other information contained in the plan (e.g., risk assessment) into other planning mechanisms, when appropriate?	pp. 232-370	Where appropriate, the plan explains how the jurisdiction incorporated the mitigation strategies.		X
SUMMARY SCORE				X

20. Continued Public Involvement

Requirement §201.6(c)(4)(iii): [The plan maintenance process **shall** include a] discussion on how the community will continue public participation in the plan maintenance process.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan explain how continued public participation will be obtained? (For example, will there be public notices, an on-going mitigation plan committee, or annual review meetings with stakeholders?)	p. 77	The plan explains how the public will continue to participate. Recommended Revision (Feb. 2010): Include a description of how residents on the west side of Jefferson County will be included in the public participation process.		X
SUMMARY SCORE				X

END OF REVIEW

Hazard Mitigation Plan – NFIP Requirements

As of October 1, 2008, Flood Mitigation Assistance (FMA) Plan requirements were added to 44 CFR §201.6, which applies to Local Hazard Mitigation Plans (LHMPs.) These changes result in new requirements for NFIP-related information to be included in LHMPs and create a single planning requirement that applies to FMA, as well as HMGP and PDM, grant eligibility. This document explains the new requirements and provides suggestions to assist communities in meeting them.

1. Assessing Vulnerability: Addressing Repetitive Loss Properties

Requirement §201.6(c)(2)(ii): *[The risk assessment] must also address National Flood Insurance Program (NFIP) insured structures that have been repetitively damaged by floods.*

As part of the Risk Assessment, LHMPs must discuss repetitive loss and severe repetitive loss properties as defined by the National Flood Insurance Program (NFIP).

A Repetitive Loss Property is defined in the Flood Insurance Manual as “an NFIP insured structure that has had at least two paid flood losses of more than \$1,000 each in any 10-year period since 1978.”

Severe Repetitive Loss Properties are defined in 44 CFR §79.2(g) as follows:

Severe Repetitive Loss Properties are defined as single or multifamily residential properties that are covered under an NFIP flood insurance policy and:

- (1) That have incurred flood-related damage for which 4 or more separate claims payments have been made, 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 2 separate claims payments (building payments only) have been made under such coverage, with cumulative amount of such claims exceeding the market value of the building.
- (3) In both instances, at least 2 of the claims must be within 10 years of each other, and claims made within 10 days of each other will be counted as 1 claim.

The plan should include the following information about repetitive loss and severe repetitive loss properties:

- Number of properties in the community.
- Number, dates, and amounts of claims paid.
- Maps showing areas of repetitive loss concentration.
- If and how these properties will be mitigated or addressed in the future.

Use of flood insurance claim information is subject to The Privacy Act of 1974, as amended, which prohibits public release of the names of policy holders and the amount of the claim payment or assistance. Do not identify specific parcel, address, or ownership information; however, summary information and maps can be made public.

The best resources for repetitive loss information are the State NFIP Coordinator and FEMA Insurance Specialist.

2. Identification and Analysis of Mitigation Actions: National Flood Insurance Program (NFIP) Compliance

Requirement: §201.6(c)(3)(ii): *[The mitigation strategy] must also address the jurisdiction’s participation in the National Flood Insurance Program (NFIP), and continued compliance with NFIP requirements, as appropriate.*

LHMP’s Mitigation Strategy must describe the community’s participation in the NFIP and include actions that address continued compliance with the NFIP. There is a variety of information that addresses NFIP participation; similarly, there are many ways to address continued compliance with the NFIP.

National Flood Insurance Program Participation

This section provides an overview of information to consider for inclusion in the LHMP regarding NFIP participation.

Topic	Considerations	Where to find information
Insurance Summary	<ul style="list-style-type: none"> • How many NFIP policies are in the community? What is the total premium and coverage? • How many claims have been paid in the community? What is the total amount of paid claims? How many of the claims were for substantial damage? • Number of structures exposed to flood risk within the community • Describe any areas of flood risk with limited NFIP policy coverage 	<ul style="list-style-type: none"> • State NFIP Coordinator or FEMA NFIP Specialist • FEMA NFIP or Insurance Specialist • Community Floodplain Administrator (FPA) • Community FPA & FEMA Insurance Specialist
Staff resources	<ul style="list-style-type: none"> • Does the community have a dedicated Floodplain Manager or NFIP Coordinator? • Is floodplain management an auxiliary duty? • Is there a Certified Floodplain Manager on staff? • Provide an explanation of NFIP administration services (e.g., permit review, GIS, education or outreach, inspections, engineering capability) • What are the barriers to running an effective NFIP program in the community, if any? 	<ul style="list-style-type: none"> • Community FPA • Community FPA • Community FPA • Community FPA • Community FPA
Topic	Considerations	Where to find information
Compliance history	<ul style="list-style-type: none"> • Is the community in good standing with the NFIP? • Are there any outstanding compliance issues (i.e., current violations)? • When was the most recent Community Assistance Visit (CAV) or Community Assistance Contact (CAC)? • Is a CAV or CAC scheduled or needed? 	<ul style="list-style-type: none"> • State NFIP Coordinator, FEMA NFIP Specialist, community records
Regulation	<ul style="list-style-type: none"> • When did the community enter the NFIP? • What did the community's Flood Insurance Rate Maps (FIRMs) become effective? • Are the FIRMs digital or paper? • Does the Floodplain Ordinance meet or exceed FEMA or State minimum requirements? If so, in what ways? • Provide an explanation of the permitting process and include a copy of floodplain permit 	<ul style="list-style-type: none"> • Community Status Book http://www.fema.gov/fema/csb.shtm • Community FPA, State or FEMA NFIP Specialists • Community FPA • Community FPA

Community Rating System (CRS)	<ul style="list-style-type: none"> • Does the community participate in CRS? • What is the community's CRS Class Ranking? • What categories and activities provide CRS points and how can the class be improved? • Does the plan include CRS planning requirements 	<ul style="list-style-type: none"> • Community FPA, State, FEMA NFIP • Flood Insurance Manual http://www.fema.gov/business/nfip/manual.shtm • Community FPA, FEMA CRS Coordinator, ISO representative • CRS manual http://www.fema.gov/library/viewRecord.do?id=2434
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NFIP Continued Compliance Actions

The requirement to include actions related to continued compliance with the NFIP in the LHMP's Mitigation Strategy is not met by discussing ways to reduce flood risk. The Mitigation Strategy must include actions that address the administration of the NFIP in the community. This section outlines topics to consider when developing NFIP compliance related actions.

Topic	Considerations
Staff resources	Identify need for additional staff Identify training needs of existing staff
Compliance	When is the next Community Assistance Visit anticipated? If unknown, discuss any need for CAV, CAC, or other compliance assistance.
Regulation	Are there potential ordinance changes to consider to strengthen requirements? Are there potential improvements to permitting process or other administrative aspects of the community's NFIP program? Could the community enhance its floodplain services?
Flood Risk Maps	Are there flood prone areas that need new flood studies? What areas are highest priority and why? Does the community have new data that can be included in future flood map updates?
Community Outreach	Consider outreach and education to provide in the community. Outreach can be targeted to increase NFIP policies, promote NFIP services, or increase knowledge of local flood risk, among other topics. Consider a variety of audiences, such as elected officials or builders.
Community Rating System (CRS)	Does the community want to participate in the CRS program? Does the community want to improve its current CRS class ranking? Identify activities the community is or will be pursuing to gain CRS points.

Contact Information

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