INSTRUCTIONS FOR USING THE PLAN REVIEW CROSSWALK FOR REVIEW OF LOCAL MITIGATION PLANS

Attached is a Plan Review Crosswalk based on the ***Local Multi-Hazard Mitigation Planning Guidance***, published by FEMA in July, 2008. This Plan Review Crosswalk is consistent with the *Robert T. Stafford Disaster Relief and Emergency Assistance Act* (Stafford Act), as amended by Section 322 of the *Disaster Mitigation Act of 2000* (P.L. 106-390), the *National Flood Insurance Act of 1968,* as amended by the *National Flood Insurance Reform Act of 2004* (P.L. 108-264) and *44 Code of Federal Regulations (CFR) Part 201 – Mitigation Planning,* inclusive of all amendments through October 31, 2007.

SCORING SYSTEM
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.

Each requirement includes separate elements. All elements of a requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a summary score of "Satisfactory." A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing.

When reviewing single jurisdiction plans, reviewers may want to put an N/A in the boxes for multi-jurisdictional plan requirements. When reviewing multi-jurisdictional plans, however, all elements apply. 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. Optional matrices for assisting in the review of sections on profiling hazards, assessing vulnerability, and identifying and analyzing mitigation actions are found at the end of the Plan Review Crosswalk.

The example below illustrates how to fill in the Plan Review Crosswalk.:

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	SCORE S
A. Does the **new or updated** plan include an **overall summary** description of the jurisdiction's **vulnerability** to each hazard?	Section II, pp. 4-10	The plan describes the types of assets that are located within geographically defined hazard areas as well as those that would be affected by winter storms.		
B. Does the **new or updated** plan address the **impact** of each hazard on the jurisdiction?	Section II, pp. 10-20	The plan does not address the impact of two of the five hazards addressed in the plan. **Required Revisions:** • Include a description of the impact of floods and earthquakes on the assets. **Recommended Revisions:** This information can be presented in terms of dollar value or percentages of damage.		
		SUMMARY SCORE		

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		X
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)		X
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	**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	**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*	**N**	**S**
Insert State Requirement		
Insert State Requirement		
Insert State Requirement		

LOCAL MITIGATION PLAN APPROVAL STATUS

PLAN NOT APPROVED	
See Reviewer's Comments	
PLAN APPROVED	

LOCAL MITIGATION PLAN REVIEW CROSSWALK

Local Mitigation Plan Review and Approval Status

Jurisdiction:	**Title of Plan:**	**Date of Plan:**
Fulton County	Fulton County Hazard Mitigation Plan	8/30/10 Version for PEMA and FEMA Review

Local Point of Contact: Mary K. Seville	**Address:** 219 North Second Street Suite 102 McConnellsburg, PA 17233
Title: Planning and Mapping Director	
Agency: Fulton County Planning Commission	
Phone Number: (717) 485-3717	**E-Mail:** mkseville@co.fulton.pa.us

State Reviewer:	**Title:**	**Date:**

FEMA Reviewer:	**Title:**	**Date:**
Date Received in FEMA Region [Insert #]		
Plan Not Approved		
Plan Approved		
Date Approved		

Jurisdiction:	**DFIRM**		**NFIP Status***			
	In Plan	**NOT in Plan**	**Y**	**N**	**N/A**	**CRS Class**
1. Ayr Township	x		x			*Not Participating*
2. Belfast Township	x		x			*Not Participating*
3. Bethel Township	x		x			*Not Participating*
4. Brush Creek Township	x		x			*Not Participating*
5. Dublin Township	x		x			*Not Participating*
6. Licking Creek Township	x		x			*Not Participating*

LOCAL MITIGATION PLAN REVIEW CROSSWALK

Jurisdiction:	DFIRM		NFIP Status*			
	In Plan	NOT in Plan	Y	N	N/A	CRS Class
7. McConnellsburg Borough	x		x			*Not Participating*
8. Taylor Township	x		x			*Not Participating*
9. Thompson Township	x		x			*Not Participating*
10. Todd Township	x		x			*Not Participating*
11. Union Township	x		x			*Not Participating*
12. Wells Township	x		x			*Not Participating*

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

LOCAL MITIGATION PLAN REVIEW CROSSWALK

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	SCORE MET
A. Has the local governing body adopted **new or updated** plan?	Section 3.5 (p. 18); Appendix A	The County and several municipalities have adopted the draft. They are listed in the table on page 18, and adoption resolutions are included in Appendix A.		X
B. Is supporting documentation, such as a resolution, included?	Appendix A	The County and several municipalities have since adopted the draft. They are listed in the table on page 18, and adoption resolutions are included in Appendix A.		X
		SUMMARY SCORE		X

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	SCORE MET
A. Does the **new or updated** plan indicate the specific jurisdictions represented in the plan?	Section 3.5 (p. 17)	Table 7 lists all participating jurisdictions and their involvement in the planning process.		X
B. For each jurisdiction, has the local governing body adopted the **new or updated** plan?	Section 3.5 (p. 17); Appendix A	The County and several municipalities have adopted the draft. They are listed in the table on page 18, and adoption resolutions are included in Appendix A.		X
C. Is supporting documentation, such as a resolution, included for each participating jurisdiction?	Appendix A	The County and several municipalities have since adopted the draft. They are listed in the table on page 18, and adoption resolutions are included in Appendix A.		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	SCORE MET

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	SCORE MET
A. Does the **new or updated** plan describe **how** each jurisdiction participated in the plan's development?	Sections 3.4-3.5 (pp. 16-18);	Addressed recommended revision by adding text to Sections 3.4 and 3.5 describing how each jurisdiction participated in the planning process.		X
B. Does the updated plan identify all participating jurisdictions, including new, continuing, and the jurisdictions that no longer participate in the plan?	Section 3.4 (p. 16); Section 3.5 (p. 17);	Section 3.4 provides narrative summary detail. Added description of how jurisdictions participated in the 2005 plan implementation to Section 6.1. Removed Valley-Hi Borough from the plan, as that borough did not participate in the planning process.		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	SCORE S
A. Does the plan provide a narrative description of the process followed to prepare the **new or updated** plan?	Sec. 3.1 (p. 13); Sec. 4.1 (p. 20); Sec. 5.1 (p. 95), Sec. 6.1 (p. 116); Sec. 7.1 (p. 136)	Added detail to narrative descriptions that are provided at the beginning of every section of the plan.		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.*?)	Sec. 1.1 (p. 1); Sec. 3.2 (p. 14)	A list of Steering Committee members is provided in sec. 3.2 and the involvement of contractors is described in sec. 1.1.		X

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	SCORE S
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?)	Sec. 3.3 (p. 15);; Sec. 3.4 (pp. 16-17); Appendix B	Addressed recommended revisions by expanding the description of outreach efforts in Section 3.4. Added copies of public notices of outreach meeting.		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?	Sec. 3.2 (p. 14); Sec. 3.4 (p. 16); Appendix B	Stakeholders are included in the list of Steering Committee members in section 3.2. Added copies of public notices of outreach meeting. Invitations to participate in the planning process, as well as minutes from meetings that included stakeholders, are included in Appendix B.		X
E. Does the planning process describe the review and incorporation, if appropriate, of existing plans, studies, reports, and technical information?	Sec. 3.6 (p. 19); Sec. 5.2 (p. 96); Sec. 7.3 (p. 137)	Addressed required revisions by adding detail as to how related planning mechanisms were used in the development of the plan. Reference to PASDA data from Northeast PA was a typo; it has been corrected to Southwest PA. The full data set split Pennsylvania into four quadrants: northeast, northwest, southeast, and southwest; Fulton County falls in the southwest quadrant.		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?	Sec. 3.1 (p. 13); Sec. 4.1 (p. 20); Sec. 5.1 (p. 95), Sec. 6.1 (p. 116); Sec. 7.1 (p. 136)	Narrative descriptions are provided at the beginning of every section of the plan. Addressed required revision by adding text to the Record of Changes form.		X
		SUMMARY SCORE		X

LOCAL MITIGATION PLAN REVIEW CROSSWALK

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	SCORE S
A. Does the **new or updated** plan include **a description** of the types of **all natural hazards** that affect the jurisdiction?	Sec. 4.2 (p. 25); Sections 4.4.1-4.4.2 (pp. 86-88); Appendix C	Section 4.2 includes a list of all identified natural hazards, categorized into geological, meteorological, and biological hazards. Addressed required revision by adding profiles for Severe Winter Storms, Drought, Wildfires, Subsidence and Sinkholes, Hailstorms, and Earthquakes. The original plan listed 28 hazards but only profiled four. Dam failures are not a natural hazard; the associated flooding that would occur from a dam failure is described in the Floods, Flash Floods, and Ice Jams profile.		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	SCORE 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?	Section 4.3.1.1 (p. 39); Section 4.3.2.1 (p. 44); Section 4.3.3.1 (p. 49); Section 4.3.4.1 (p. 57); Section 4.3.5.1 (p. 61); Section 4.3.6.1 (p. 66); Section 4.3.7.1 (p. 71); Section 4.3.8.1 (p. 75);	Addressed required revisions by adding profiles for Severe Winter Storms, Drought, Wildfires, Subsidence and Sinkholes, Hailstorms, and Earthquakes. Each includes a "Location and Extent" section. The PA DEP floodplains layer that was used in the 1% chance floodplain mapping and associated analysis was based on the FEMA FIRM. Updated DFIRMs were not provided to the County in time to conduct analysis for this HMP update, nor did the County want to use preliminary maps until they were finalized.		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	SCORE S
	Section 4.3.9.1 (p. 79); Section 4.3.10.1 (p. 80);			
B. Does the risk assessment identify the **extent** (*i.e.*, magnitude or severity) of each hazard addressed in the **new or updated** plan?	Section 4.3.1.2 (p. 39); Section 4.3.2.2 (p. 45); Section 4.3.3.2 (p. 51); Section 4.3.4.2 (p. 57); Section 4.3.5.2 (p. 62); Section 4.3.6.2 (p. 66); Section 4.3.7.2 (p. 73); Section 4.3.8.2 (p. 77); Section 4.3.9.2 (p. 79); Section 4.3.10.2 (p. 80)	Specific impacts of the worst-case scenario for each hazard are described in the "Range of Magnitude" section in each hazard profile. Critical infrastructure, including SARA facilities, are shown on the floodplain maps in Appendix D and the vulnerability maps for the other hazards. Data on specific numbers of properties impacted by each event is not available. The 1985 tornado is described in text; the 2004 tornado is listed and described in the table in section 4.3.2.3.		X
C. Does the plan provide information on **previous occurrences** of each hazard addressed in the **new or updated** plan?	Section 4.3.1.3 (p. 39); Section 4.3.2.3 (p. 46); Section 4.3.3.3, (p. 51); Section 4.3.4.3 (p. 58); Section 4.3.5.3 (p. 62); Section 4.3.6.3 (p. 67); Section 4.3.7.3 (p. 73);	Addressed recommended revisions by listing the specific SARA facilities vulnerable to each hazard in the tables of vulnerable critical infrastructure within the "Vulnerability Assessment" section of each hazard profile.		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	SCORE S
	Section 4.3.8.3 (p. 78); Section 4.3.9.3 (p. 79); Section 4.3.10.3 (p. 82)			
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?	Section 4.3.1.4 (p. 41); Section 4.3.2.4 (p. 48); Section 4.3.3.4 (p. 52); Section 4.3.4.4 (p. 60); Section 4.3.5.4 (p. 65); Section 4.3.6.4 (p. 70); Section 4.3.7.4 (p. 74); Section 4.3.8.4 (p. 78); Section 4.3.9.4 (p. 79); Section 4.3.10.4 (p. 84)	Plan has a section titled "Future Occurrence" for each hazard profile that provides a qualitative description of probability of future events. Required revisions were addressed by updating that section in each hazard profile. The national-level wind vulnerability map was replaced with one showing the state-level vulnerability. Context would be lost if the map showed only Fulton County.		X
		SUMMARY SCORE		X

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	SCORE S
A. Does the **new or updated** plan include an **overall summary** description of the jurisdiction's **vulnerability** to each hazard?	Section 4.3.1.5 (p. 42); Section 4.3.2.5 (p. 48); Section 4.3.3.5 (p. 52); Section 4.3.4.5 (p. 60); Section 4.3.5.5 (p. 65); Section 4.3.6.5 (p. 70); Section 4.3.7.5 (p. 74); Section 4.3.8.5 (p. 78); Section 4.3.9.5 (p. 80); Section 4.3.10.5 (p. 86); Section 4.4 (p. 86)	A summary of overall vulnerability is provided for each hazard using a rating factor approach. Addressed required revisions by removing several hazards (e.g., volcano, avalanche, tsunami) from the Risk Factor analysis in Appendix C; those hazards are listed in Section 4.2.2. Additional maps were added to the hazard profiles, and each hazard profile has a map showing critical infrastructure vulnerable to the hazard. Some hazards (e.g., wind, winter storms, earthquakes) have a geographic extent so broad that mapping only the county would not provide context, so it is appropriate to map at least the state for those hazards.		X
B. Does the **new or updated** plan address the **impact** of each hazard on the jurisdiction?	Section 4.3.1.2 (p. 39); Section 4.3.1.5 (p. 42); Section 4.3.2.2 (p. 45); Section 4.3.2.5 (p. 48); Section 4.3.3.2 (p. 51); Section 4.3.3.5 (p. 52); Section 4.3.4.2 (p. 57); Section 4.3.4.5	Hazard impacts are described in the "Range of Magnitude" and "Vulnerability Assessment" sections of each hazard profile. Potential loss estimates are provided for several hazards in Section 4.4.3.		X

	(p. 60); Section 4.3.5.2 (p. 62); Section 4.3.5.5 (p. 65); Section 4.3.6.2 (p. 66); Section 4.3.6.5 (p. 70); Section 4.3.7.2 (p. 73); Section 4.3.7.5 (p. 74); Section 4.3.8.2 (p. 77); Section 4.3.8.5 (p. 78); Section 4.3.9.2 (p. 79); Section 4.3.9.5 (p. 80); Section 4.3.10.2 (p. 80); Section 4.3.10.5 (p. 86); Section 4.4.3 (pp. 88-91)			
		SUMMARY SCORE		X

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?	4.4.3.1 (p. 89)			X
		SUMMARY SCORE		X

LOCAL MITIGATION PLAN REVIEW CROSSWALK

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	SCORE 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?	Section 4.3.1.5 (p. 42); Section 4.3.2.5 (p. 48); Section 4.3.3.5 (p. 52); Section 4.3.4.5 (p. 60); Section 4.3.5.5 (p. 65); Section 4.3.6.5 (p. 70); Section 4.3.7.5 (p. 74); Section 4.3.8.5 (p. 78); Section 4.3.9.5 (p. 80); Section 4.3.10.5 (p. 86)	Vulnerable critical infrastructure is listed in the "Vulnerability Assessment" section of each hazard profile. Added revised table of structures in the floodplain to Section 4.4.3.1, page 89.		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?	Section 4.4.4 (p. 92)			X
		SUMMARY SCORE		X

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	SCORE S
A. Does the **new or updated** plan estimate **potential dollar losses** to vulnerable structures?	Section 4.4.3 (pp. 88-91); Appendix E	The HAZUS analysis in Appendix E lists the total replacement value of the entire county at $886 million; the potential loss figure in Section 4.4.3 is based on properties within the 1% chance floodplain only. HAZUS shows $12.85 million in potential losses. The methodology used in the HMP update is described in Section 4.4.3. The difference between the value shown in the HMP and the value shown in HAZUS may be based on methodology or data set. Added the above statement to Section 4.4.3.1.		X
B. Does the **new or updated** plan describe the **methodology** used to prepare the estimate?	Section 4.4.3 (p. 90); Appendix E	Added version of HAZUS used to front page of Appendix E and to Section 4.4.3.1.		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	SCORE S
A. Does the **new or updated** plan describe land uses and development trends?	Sec. 2.4 (p. 11); sec. 4.4.4 (p. 92)	Maps included throughout the HMP are low-resolution so as to limit the file size of the document, thereby making it easier to post on the County Web site. The two maps showing changes in development via impervious surface coverage are described in Section 4.4.4; their value can be determined there.		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	SCORE S
A. Does the **new or updated** plan include a risk assessment for each participating jurisdiction as needed to reflect unique or varied risks?	Section 4.2 (p. 25); Section 4.3.1.5 (p. 42); Section 4.3.2.5 (p. 48); Section 4.3.3.5 (p. 52); Section 4.3.4.5 (p. 60); Section 4.3.5.5 (p. 65); Section 4.3.6.5 (p. 70); Section 4.3.7.5 (p. 74); Section 4.3.8.5 (p. 78); Section 4.3.9.5 (p. 80); Section 4.3.10.5 (p. 86)	Where geographical extent is applicable, the vulnerability assessments indicate which jurisdictions are affected. The individual jurisdictions vulnerable to each hazard (i.e., the unique risks) are listed in Section 4.2.		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	SCORE 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?	Sec. 6.2.1 (p. 118)	5 goals are listed addressing mitigation and response capabilities.		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	SCORE S
A. Does the **new or updated** plan identify and analyze a **comprehensive range** of specific mitigation actions and projects for each hazard?	Sec. 6.4 (p. 122); Sec. 6.4.2 (p. 125)			X
B Do the identified actions and projects address reducing the effects of hazards on **new** buildings and infrastructure?	Sec. 6.4, goals 1 and 2 (pp. 122-124)	Regulations for new construction are discussed in goal 2. Addressed required revisions by changing the wording of 1.A.1, 2.A.1, 2.A.2, and 2.A.3 to reflect new structures as well.		X
C. Do the identified actions and projects address reducing the effects of hazards on **existing** buildings and infrastructure?	Sec. 6.4, goals 1, 2, and 5 (pp. 122-125)	New regulations, mitigation projects, and actions to obtain better information are included.		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	SCORE S
A. Does the new or updated plan describe the jurisdiction (s) participation in the NFIP?	Sec. 5.2.2.1-5.2.2.2 (pp. 98-99)			X
B. Does the mitigation strategy identify, analyze and prioritize actions related to continued compliance with the NFIP?	Section 5.2.2.1 (p. 98); Sec. 6.2.2 (p. 118); Sec. 6.4.1 (p. 122)	Description of how NFIP is administered at the local level is provided in Section 5.2.2.1.		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	SCORE 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?)	Sec. 6.4.2 (p. 125); Sec. 6.4.3 (p. 133)	Actions were considered using the PA STEEL system and prioritized by vote of the Steering Committee.		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?	Appendix F	Relevant information is provided about how actions will be administered and implemented. Implementation could benefit from additional detail, however.		X
C. Does the **new or updated** prioritization process include an emphasis on the use of a **cost-benefit review** to maximize benefits?	Sec. 6.4.3 (p. 133); Appendix F	PA STEEL involved cost-benefit review.		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?	Sec. 6.1 (p. 116)	Completed matrix and description of implementation of action items can be found in Section 6.1. Those that were not completed or deleted (as indicated in the table in Section 6.1) were carried over and evaluated and prioritized with all of the other 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	SCORE S
A Does the **new or updated** plan include identifiable **action items** for each jurisdiction requesting FEMA approval of the plan?	Appendix F	Several actions apply to all jurisdictions requesting FEMA approval.		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?	Sec. 6.1 (p. 116)	Completed matrix and description of implementation of action items can be found in Section 6.1. Those that were not completed or deleted (as indicated in the table in Section 6.1) were carried over and evaluated and prioritized with all of the other actions.		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	SCORE S
A. Does the **new or updated** plan describe the method and schedule for **monitoring** the plan, including the responsible department?	Sec. 7.2 (p. 136)	The plan will be reviewed annually and after emergency declarations.		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)?	Sec. 7.2 (p. 136); Appendix F	The Steering Committee's review will conclude with a Progress Report. The Progress Report template is located in Appendix E.		X
C. Does the **new or updated** plan describe the method and schedule for **updating** the plan within the five-year cycle?	Sec. 7.2 (p. 136)	New projects will be solicited annually.		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	SCORE S
A. Does the **new or updated** plan identify other local planning mechanisms available for incorporating the mitigation requirements of the mitigation plan?	Section 7.3.1 (p. 137); Section 7.3.2 (p. 138); Section 7.3.3 (p. 138)	The plan identifies Land Use Ordinances and Regulations, the Emergency Operations Plan (Title 35), and the Comprehensive Plan (MPC Section 301). Added discussion of plan interrelationships to Section 7.3.3. Jurisdictions that have adopted floodplain management plans are identified in Section 5.2.3.3. However, floodplain management is incorporated into the Fulton County Comprehensive Plan, which all municipalities but one have adopted.		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?	Section 7.3.1 (p. 137); Section 7.3.2 (p. 138)	The plan gives schedules and provides a figure demonstrating how future incorporation will take place.		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?	Section 7.3.1 (p. 137); Section 7.3.2 (p. 138); Section 7.3.3 (p. 138)			X
		SUMMARY SCORE		X

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	SCORE 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?)	Sec. 7.4 (p. 141)	The plan will be posted on the County Web site and public comment will be encouraged.		X
		SUMMARY SCORE		X