

The *Local Mitigation Plan Review Tool* demonstrates how the Local Mitigation Plan meets the regulation in 44 CFR §201.6 and offers States and FEMA Mitigation Planners an opportunity to provide feedback to the community.

- The Regulation Checklist provides a summary of FEMA’s evaluation of whether the Plan has addressed all requirements.
- The Plan Assessment identifies the plan’s strengths as well as documents areas for future improvement.
- The Multi-jurisdiction Summary Sheet is an optional worksheet that can be used to document how each jurisdiction met the requirements of the each Element of the Plan (Planning Process; Hazard Identification and Risk Assessment; Mitigation Strategy; Plan Review, Evaluation, and Implementation; and Plan Adoption).

The FEMA Mitigation Planner must reference this *Local Mitigation Plan Review Guide* when completing the *Local Mitigation Plan Review Tool*.

<b>Jurisdiction:</b> City of Ann Arbor, Michigan	<b>Title of Plan:</b> 2022 City of Ann Arbor Hazard Mitigation Plan Update	<b>Date of Plan:</b> August 2022
<b>Local Point of Contact:</b> Sydney Parmenter	<b>Address:</b> Ann Arbor Public Safety 111 North Fifth Avenue Ann Arbor, MI 48104	
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<b>State Reviewer:</b>	<b>Title:</b>	<b>Date:</b>
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<b>FEMA Reviewer:</b>  Lorena Reyes	<b>Title:</b>  Plan reviewer	<b>Date:</b>  9/26/22
<b>Date Received in FEMA Region (insert #)</b>	9/13/22	
<b>Plan Not Approved</b>		
<b>Plan Approvable Pending Adoption</b>	XX	
<b>Plan Approved</b>		

**SECTION 1:  
REGULATION CHECKLIST**

**INSTRUCTIONS:** The Regulation Checklist must be completed by FEMA. The purpose of the Checklist is to identify the location of relevant or applicable content in the Plan by Element/sub-element and to determine if each requirement has been ‘Met’ or ‘Not Met.’ The ‘Required Revisions’ summary at the bottom of each Element must be completed by FEMA to provide a clear explanation of the revisions that are required for plan approval. Required revisions must be explained for each plan sub-element that is ‘Not Met.’ Sub-elements should be referenced in each summary by using the appropriate numbers (A1, B3, etc.), where applicable. Requirements for each Element and sub-element are described in detail in this *Plan Review Guide* in Section 4, Regulation Checklist.

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan</b>		<b>Not</b>	
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>		<b>(section and/or page number)</b>		<b>Met</b>	<b>Met</b>
<b>ELEMENT A. PLANNING PROCESS</b>					
A1. Does the Plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction? (Requirement §201.6(c)(1))	Section 1, pg. 1-4  Section 2; <u>How it was prepared</u> – pgs. 2-4 to 2-20  <u>Who was involved</u> - Steering Committee, TAC, Community Engagement Working Group – pgs. 2-5 to 2-9; Table 2.2	X			
A2. Does the Plan document an opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, agencies that have the authority to regulate development as well as other interests to be involved in the planning process? (Requirement §201.6(b)(2))	Section 2 – Involving the Stakeholders, pg. 2-19; Table 2.2 pg. 2-6; Plan Development Meetings, pgs. 2-9 to 2-13  <u>Neighboring communities; local/regional agencies:</u> Local/Regional agencies involved in mitigation include the Huron River Watershed Council; UM; Public meetings open to all jurisdictions and interested parties, and publicized broadly  <u>Authority to regulate:</u> The TAC included the planning manager and floodplain manager who have the authority to regulate development	X			

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan (section and/or page number)</b>	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))	Section 2 - Involving the Public, Pgs. 2-13 to 2-18  Two virtual public meetings, a public survey, plan draft review period, project website, posting of meeting recording, promotion at public events, broad advertisement, public adoption meeting	X		
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))	Section 2 - Incorporation of Plans, Studies, and Technical Information, pg. 2-19 to 2-20  Section 3 & 4, documented use of existing studies throughout sections via end notes  Section 5	X		
A5. Is there discussion of how the community(ies) will continue public participation in the plan maintenance process? (Requirement §201.6(c)(4)(iii))	Section 7, pg. 7-7: Continued Public Involvement  Annual CRS report, bi-annual steering committee meeting; ongoing hazard awareness via city communication channels	X		
A6. Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a 5-year cycle)? (Requirement §201.6(c)(4)(i))	Section 7, pgs. 7-4 to 7-6  TAC meeting bi-annually to review action progress; approximately monthly working groups aligned to actions; 5 year update	X		
<b><u>ELEMENT A: REQUIRED REVISIONS</u></b>				
<b>ELEMENT B. HAZARD IDENTIFICATION AND RISK ASSESSMENT</b>				
B1. Does the Plan include a description of the type, location, and extent of all natural hazards that can affect each jurisdiction(s)? (Requirement §201.6(c)(2)(i))	Section 4  Each hazard in Section 4 includes a sub-section for type, location and extent.	X		

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan</b> (section and/or page number)	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
B2. Does the Plan include information on previous occurrences of hazard events and on the probability of future hazard events for each jurisdiction? (Requirement §201.6(c)(2)(i))	Section 4  Each hazard in Section 4 includes a sub-section for previous occurrences and probability.  Table 4-1, pg. 4-4, Presidential Disaster Declarations	X		
B3. Is there a description of each identified hazard's impact on the community as well as an overall summary of the community's vulnerability for each jurisdiction? (Requirement §201.6(c)(2)(ii))	Section 4  <u>Impacts</u> Each hazard in Section 4 includes a sub-section for vulnerability and impacts  <u>Social Vulnerability Data:</u> pg. 4-18 to 4-20  <u>Summary of Overall Vulnerability:</u> pg. 4-242 to 4-248; Table 4-52	X		
B4. Does the Plan address NFIP insured structures within the jurisdiction that have been repetitively damaged by floods? (Requirement §201.6(c)(2)(ii))	Section 4 – NFIP Considerations, page 4-135 to 4-137  Section 5, pg. 5-18	X		
<b><u>ELEMENT B: REQUIRED REVISIONS</u></b>				
<b>ELEMENT C. MITIGATION STRATEGY</b>				
C1. Does the plan document each jurisdiction's existing authorities, policies, programs and resources and its ability to expand on and improve these existing policies and programs? (Requirement §201.6(c)(3))	Section 5, pgs. 5-4 to 5-27  <u>Ability to expand/improve:</u> Pgs. 5-6	X		
C2. Does the Plan address each jurisdiction's participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement §201.6(c)(3)(ii))	Section 4, pg. 4-135  Section 5, pgs. 5-17 to 5-20	X		
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))	Section 1, pgs. 5-6 (plan purpose)  Section 6, pg. 6-5	X		

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan (section and/or page number)</b>	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
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 §201.6(c)(3)(ii))	Section 6, pgs. 6-8 to 6-10 (tied to 7 mitigation techniques)  Action Plan, pg. 6-16 to end	X		
C5. Does the Plan contain an action plan that describes how the actions identified will be prioritized (including cost benefit review), implemented, and administered by each jurisdiction? (Requirement §201.6(c)(3)(iv)); (Requirement §201.6(c)(3)(iii))	Section 6  <u>Prioritization:</u> pgs. 6-11 to 6-14  <u>Implementation/administration:</u> Action Plan, pg. 6-16 to end (Responsible entity)  Section 7, pg. 7-4 to 7-5 (working group for each action, bi-annual steering committee meetings)	X		
C6. Does the Plan describe a process by which local governments will integrate the requirements of the mitigation plan into other planning mechanisms, such as comprehensive or capital improvement plans, when appropriate? (Requirement §201.6(c)(4)(ii))	Section 6, pg. 6-5, Goal #3  Section 7 – Integration, pg. 7-3 to 7-4	X		
<b><u>ELEMENT C: REQUIRED REVISIONS</u></b>				
<b><u>ELEMENT D. PLAN REVIEW, EVALUATION, AND IMPLEMENTATION</u></b> (applicable to plan updates only)				
D1. Was the plan revised to reflect changes in development? (Requirement §201.6(d)(3))	Section 3 – Housing, Infrastructure and Land Use Section on page 3-6  Section 4, pg. 4-16 to 4-17: Areas of New Development; pg. 4-143 development and redevelopment trends	X		
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))	Section 1, pg. 1-4  Section 6, pgs. 6-5 to 6-7  Appendix C7	X		

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan</b> (section and/or page number)	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))	Section 1, pg. 1-4: notes focus on equity, climate change, and near-term actionability as 2022 priorities  Section 4, pg. 4-4: hazards added in plan update; Fig. 4-43, Future Land Uses in Floodplain Hazard Areas  Section 6; Goals were updated for the 2022 plan update. Priorities for actions were updated accordingly	X		
<b><u>ELEMENT D: REQUIRED REVISIONS</u></b>				
<b>ELEMENT E. PLAN ADOPTION</b>				
E1. Does the Plan include documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval? (Requirement §201.6(c)(5))	Appendix A (placeholder; to be completed following an “Approved Pending Adoption Status”)			
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))	N/A Single Jurisdiction			
<b><u>ELEMENT E: REQUIRED REVISIONS</u></b>				
<b>OPTIONAL: HIGH HAZARD POTENTIAL DAM RISKS</b>				
HHPD1. Did Element A4 (planning process) describe the incorporation of existing plans, studies, reports, and technical information for high hazard potential dams?	N/A (no HHPD-eligible dams in the jurisdiction)	N/A		
HHPD2. Did Element B3 (risk assessment) address HHPDs?	N/A (no HHPD-eligible dams in the jurisdiction)	N/A		
HHPD3. Did Element C3 (mitigation goals) include mitigation goals to reduce long-term vulnerabilities from high hazard potential dams that pose an unacceptable risk to the public?	N/A (no HHPD-eligible dams in the jurisdiction)	N/A		
HHPD4. Did Element C4-C5 (mitigation actions) address HHPDs prioritize mitigation actions to reduce vulnerabilities from high hazard potential dams that pose an unacceptable risk to the public?	N/A	N/A		

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan</b> (section and/or page number)	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
<b><u>REQUIRED REVISIONS</u></b>				
<b>ELEMENT F. ADDITIONAL STATE REQUIREMENTS (OPTIONAL FOR STATE REVIEWERS ONLY; NOT TO BE COMPLETED BY FEMA)</b>				
F1.				
F2.				
<b><u>ELEMENT F: REQUIRED REVISIONS</u></b>				

## SECTION 2: PLAN ASSESSMENT

**INSTRUCTIONS:** The purpose of the Plan Assessment is to offer the local community more comprehensive feedback to the community on the quality and utility of the plan in a narrative format. The audience for the Plan Assessment is not only the plan developer/local community planner, but also elected officials, local departments and agencies, and others involved in implementing the Local Mitigation Plan. The Plan Assessment must be completed by FEMA. The Assessment is an opportunity for FEMA to provide feedback and information to the community on: 1) suggested improvements to the Plan; 2) specific sections in the Plan where the community has gone above and beyond minimum requirements; 3) recommendations for plan implementation; and 4) ongoing partnership(s) and information on other FEMA programs, specifically RiskMAP and Hazard Mitigation Assistance programs. The Plan Assessment is divided into two sections:

1. Plan Strengths and Opportunities for Improvement
2. Resources for Implementing Your Approved Plan

***Plan Strengths and Opportunities for Improvement*** is organized according to the plan Elements listed in the Regulation Checklist. Each Element includes a series of italicized bulleted items that are suggested topics for consideration while evaluating plans, but it is not intended to be a comprehensive list. FEMA Mitigation Planners are not required to answer each bullet item and should use them as a guide to paraphrase their own written assessment (2-3 sentences) of each Element.

The Plan Assessment must not reiterate the required revisions from the Regulation Checklist or be regulatory in nature and should be open-ended and to provide the community with suggestions for improvements or recommended revisions. The recommended revisions are suggestions for improvement and are not required to be made for the Plan to meet Federal regulatory requirements. The italicized text should be deleted once FEMA has added comments regarding strengths of the plan and potential improvements for future plan revisions. It is recommended that the Plan Assessment be a short synopsis of the overall strengths and weaknesses of the Plan (no longer than two pages), rather than a complete recap section by section.

***Resources for Implementing Your Approved Plan*** provides a place for FEMA to offer information, data sources and general suggestions on the plan implementation and maintenance process. Information on other possible sources of assistance including, but not limited to, existing publications, grant funding or training opportunities, can be provided. States may add state and local resources, if available.

## **A. Plan Strengths and Opportunities for Improvement**

This section provides a discussion of the strengths of the plan document and identifies areas where these could be improved beyond minimum requirements.

### **Element A: Planning Process**

*How does the Plan go above and beyond minimum requirements to document the planning process:*

- *The plan implemented a new public outreach strategy including a community engagement working group.*
- *The plan is reflective of an open and inclusive public involvement process.*

### **Element B: Hazard Identification and Risk Assessment**

*In addition to the requirements listed in the Regulation Checklist, 44 CFR 201.6 Local Mitigation Plans identifies additional elements that should be included as part of a plan's risk assessment. The plan should describe vulnerability in terms of:*

- 1) *A general description of land uses and future development trends within the community so that mitigation options can be considered in future land use decisions;*
- 2) *The types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard areas; and*
- 3) *A description of potential dollar losses to vulnerable structures, and a description of the methodology used to prepare the estimate.*

*How does the Plan go above and beyond minimum requirements to document the Hazard Identification and Risk Assessment with respect to:*

- *The plan lists data limitations that constrict the risk analysis. These can also be incorporated into mitigation actions or capability building action steps to be tracked within the next 5 years.*
- *The plan incorporated two data sources to assess areas of social vulnerability within Ann Arbor: the FEMA NRI and the Washtenaw County Opportunity Index.*
- *The plan categorized critical facilities by Community Lifelines.*
- *The plan includes climate change projections based on the Fourth National Climate Assessment and other sources.*
- *Inundation maps for city owned dams.*
- *Comparison between Ann Arbor Info SWMM Model Flood Hazard Area and FEMA SFHA.*

### **Element C: Mitigation Strategy**

*How does the Plan go above and beyond minimum requirements to document the Mitigation Strategy with respect to:*

- *Goals revised with equity, climate, and community goals in mind.*
- *Climate mitigation is considered in the plan.*

- *The mitigation actions identify benefits and costs associated with implementation.*

#### **Element D: Plan Update, Evaluation, and Implementation (Plan Updates Only)**

*How does the Plan go above and beyond minimum requirements to document the 5-year Evaluation and Implementation measures with respect to:*

- *The implementation strategy includes the creation of working groups for each action.*

### **B. Resources for Implementing Your Approved Plan**

- The current State of Michigan Hazard Mitigation Plan identifies several potential funding resources for various mitigation actions. The Michigan State Police Division of Emergency Management and Homeland Security website also has valuable information about mitigation in Michigan. <http://www.michigan.gov/msp/>
- For information about applying for grants, available publications, and training opportunities, contact Matt Schnepf, the Michigan State Hazard Mitigation Officer, at [schnepfm1@michigan.gov](mailto:schnepfm1@michigan.gov).
- Think about what actions various governmental agencies (federal and state) can fund, especially when meeting multiple community goals. Federal agencies may support integrated planning efforts such as rural development, sustainable communities and smart growth, wildfire mitigation, conservation, etc.
- Seek out other nongovernmental or non-emergency management funding sources. These can include private organizations and businesses, federal initiatives (Smart Growth, Sustainable Communities), Federal Highways pilot projects, and historic preservation programs.
- Refer to the Michigan State Hazard Mitigation Plan for more resources for local communities in Michigan.

#### **HMGP**

The Hazard Mitigation Grant Program (HMGP) is authorized by Section 404 of the Robert T. Stafford Disaster Relief and Emergency Act, as amended. The key purpose of HMGP is to ensure that the opportunity to take critical mitigation measures to reduce the risk of loss of life and property from future disasters is not lost during the reconstruction process following a disaster. HMGP is available, when authorized under the Presidential major disaster declaration, in areas of the State requested by the Governor.

#### **BRIC**

Building Resilient Infrastructure and Communities (BRIC) will support states, local communities, tribes and territories as they undertake hazard mitigation projects, reducing the risks they face from disasters and natural hazards. Reach out to your SHMO for more information on BRIC.

**FMA**

The Flood Mitigation Assistance (FMA) program is authorized by Section 1366 of the National Flood Insurance Act (NFIA) of 1968, as amended with the goal of reducing or eliminating claims under the National Flood Insurance Program (NFIP).

**National Climatic Data Center (NCDC) Storm Events Database**

The National Climatic Data Center (NCDC) Storm Events Database contains information at a countywide level for past hazard events. Property damage, crop damage, death, and injury records are available for each hazard. Where available, a narrative also accompanies many events, particularly those where there was an exceptional toll on the County.

<https://www.ncdc.noaa.gov/stormevents/>

**Tornado History Project**

The Tornado History Project is a free, searchable database of all reported US tornadoes.

<http://www.tornadohistoryproject.com>

**Technical Assistance**

Technical assistance is available through Risk MAP to assist communities in identifying, selecting, and implementing activities to support mitigation planning and risk reduction; Attend any Risk MAP's discovery meetings that may be scheduled in the State (or neighboring communities with shared watersheds boundaries) in the future.

**Building Codes**

Building codes are the minimum design and construction standards by which building owners, occupants, and the public are protected from natural hazards. Integrating modern building codes into mitigation plans and action help reduce risk to hazards and protect people and property during a disaster. More information on building codes can be found in the Building Codes Toolkit.

[https://www.fema.gov/sites/default/files/documents/fema\\_building-codes-toolkit\\_07-19-2021.pdf](https://www.fema.gov/sites/default/files/documents/fema_building-codes-toolkit_07-19-2021.pdf)

**Publications**

Mitigation Ideas: A Resource for Reducing Risk to Natural Hazards

<http://www.fema.gov/media-library/assets/documents/30627?id=6938>

FEMA Region 5 Mitigation Funding Resource Guide – Michigan

[https://www.fema.gov/sites/default/files/documents/fema\\_michigan-mitigation-assistance-resource-guide\\_082022.pdf](https://www.fema.gov/sites/default/files/documents/fema_michigan-mitigation-assistance-resource-guide_082022.pdf)

**SECTION 3:  
MULTI-JURISDICTION SUMMARY SHEET (OPTIONAL)**

**INSTRUCTIONS:** For multi-jurisdictional plans, a Multi-jurisdiction Summary Spreadsheet may be completed by listing each participating jurisdiction, which required Elements for each jurisdiction were ‘Met’ or ‘Not Met,’ and when the adoption resolutions were received. This Summary Sheet does not imply that a mini-plan be developed for each jurisdiction; it should be used as an optional worksheet to ensure that each jurisdiction participating in the Plan has been documented and has met the requirements for those Elements (A through E).

MULTI-JURISDICTION SUMMARY SHEET												
#	Jurisdiction Name	Jurisdiction Type (city/borough/ township/ village, etc.)	Plan POC	Mailing Address	Email	Phone	Requirements Met (Y/N)					
							A. Planning Process	B. Hazard Identification & Risk Assessment	C. Mitigation Strategy	D. Plan Review, Evaluation & Implementation	E. Plan Adoption	F. State Requirements
1												
2												
3												
4												
5												
6												
7												
8												
9												

**MULTI-JURISDICTION SUMMARY SHEET**

#	Jurisdiction Name	Jurisdiction Type (city/borough/ township/ village, etc.)	Plan POC	Mailing Address	Email	Phone	Requirements Met (Y/N)					
							A. Planning Process	B. Hazard Identification & Risk Assessment	C. Mitigation Strategy	D. Plan Review, Evaluation & Implementation	E. Plan Adoption	F. State Requirements
10												
11												
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