

Instructions for Using the Plan Review Crosswalk for Review of Local Mitigation Plans

Attached is a Plan Review Crosswalk based on the *Multi-Hazard Mitigation Planning Guidance Under the Disaster Mitigation Act of 2000*, published by FEMA, dated March 2004. This Plan Review Crosswalk is consistent with *44 CFR Part 201 – Mitigation Planning, Interim Final Rule* (the Rule), in accordance with the *Stafford Act* (42 U.S.C. 5165), and *44 CFR Part 78.5 – Flood Mitigation Plan Development*, in accordance with the *National Flood Insurance Act of 1968 (42 U.S.C. 4104c et seq)*.

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, reviewers may want to put an N/A in the prerequisite box for single jurisdiction plans.

States that have additional requirements can add them in the appropriate sections of the *Muliti-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.

Example

Assessing Vulnerability: Overview

- **Multihazard 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.*
- **FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk,, and the extent of flood depth and damage potential.*

Element	Location in the Plan (section or annex and page #)	Reviewer’s Comments	SCORE			
			Stafford		FMA	
			N	S	N	S
A. Does the plan include an overall summary description of the jurisdiction’s vulnerability to each hazard?						
B. Does the plan address the impact of each hazard on the jurisdiction?						
SUMMARY SCORE						

Local Mitigation Plan Review and Approval Status

Jurisdiction: Santa Rosa County	Title of Plan: Santa Rosa County Flood Mitigation Plan	Date of Plan: November 2009
Local Point of Contact: Sheila A. Harris	Address: 6495 Caroline St. Suite H Milton, FL 32570	
Title: Grants & Special Projects Coordinator		
Agency: Santa Rosa County Board of County Commissioners		
Phone Number: 850-983-1848	E-Mail: sheilah@santarosa.fl.gov	

State Reviewer: Steven Martin	Title: Floodplain Management Specialist	Date: April 2, 2010
---	---	-------------------------------

FEMA Reviewer: Ed Hale	Title: Hazard Mitigation Community Planner	Date: October 26, 2010
FEMA QC:	Title:	Date:
Date Received in FEMA Region 4	September 21, 2010	
Plan Not Approved		
Plan Approved		
Date Approved	June 13, 2011	

Jurisdiction:	NFIP Status*			
	Y	N	N/A	CRS Class
1. The City of Gulf Breeze	X			8
2. The Town of Jay (Reviewer Note: Town of Jay is listed as a participating community in FEMA database)		X		
3. The City of Milton	X			8
4. Santa Rosa County	X			6
5. [ATTACH PAGE(S) WITH ADDITIONAL JURISDICTIONS]				

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

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.

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.

Prerequisite(s) (Check Applicable Box)

STAFFORD		FMA	
NOT MET	MET	NOT MET	MET
		N/A	N/A

OR

Adoption by the Local Governing Body: §201.6(c)(5) and §78.5(f)

			X
			X

Multi-Jurisdictional Planning Participation: §201.6(a)(3) and §78.5(a)

Planning Process

Documentation of the Planning Process: §201.6(b) and §201.6(c)(1) and §78.5(a)

N	S	N	S
			X

Risk Assessment

Identifying Hazards: §201.6(c)(2)(i) and §78.5(b)

Profiling Hazards: §201.6(c)(2)(i) and §78.5(b)

Assessing Vulnerability: Overview: §201.6(c)(2)(ii) and §78.5(b)

Assessing Vulnerability: Identifying Structures: §201.6(c)(2)(ii)(A) and §78.5(b)

Assessing Vulnerability: Estimating Potential Losses: §201.6(c)(2)(ii)(B)

Assessing Vulnerability: Analyzing Development Trends: §201.6(c)(2)(ii)(C)

Multi-Jurisdictional Risk Assessment: §201.6(c)(2)(iii) and FEMA 299

N	S	N	S
			X
			X
			X
			X
		X	
			X
			X

Mitigation Strategy

Local Hazard Mitigation Goals: §201.6(c)(3)(i) and §78.5(c)

Identification and Analysis of Mitigation Actions: §201.6(c)(3)(ii) and §78.5(d)

Implementation of Mitigation Actions: §201.6(c)(3)(iii) and §78.5(d) and (e)

Multi-Jurisdictional Mitigation Actions: §201.6(c)(3)(iv) and FEMA 299

STAFFORD		FMA	
N	S	N	S
			X
			X
			X
			X

Plan Maintenance Process

Monitoring, Evaluating, and Updating the Plan: §201.6(c)(4)(i) and §78.5(e)

Incorporation into Existing Planning Mechanisms: §201.6(c)(4)(ii)

Continued Public Involvement: §201.6(c)(4)(iii)

STAFFORD		FMA	
N	S	N	S
			X
		X	
			X

Additional State Requirements*

Insert State Requirement

Insert State Requirement

Insert State Requirement

STAFFORD		FMA	
N	S	N	S

LOCAL MITIGATION PLAN APPROVAL STATUS

PLAN NOT APPROVED

PLAN APPROVED

STAFFORD		FMA	
			X

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

See Reviewer's Comments

PREREQUISITE(S)

Adoption by the Local Governing Body

- **Multihazard 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).*
- **FMA Requirement §78.5(f):** *Documentation of formal plan adoption by the legal entity submitting the plan (e.g., Governor, Mayor, County Executive).*

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

Multi-Jurisdictional Plan Adoption

- **Multihazard Requirement §201.6(c)(5):** *For multi-jurisdictional plans, each jurisdiction requesting approval of the plan must document that it has been formally adopted.*
- **FMA Requirement §78.5(f):** *Documentation of formal plan adoption by the legal entity submitting the plan (e.g., Governor, Mayor, County Executive).*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			NOT MET	MET	NOT MET	MET
A. Does the plan indicate the specific jurisdictions represented in the plan?	Cover Cover; Section 9, p.1	Participants in the FMA plan are identified as: <ul style="list-style-type: none"> • City of Gulf Breeze • City of Milton • Santa Rosa County (unincorporated) The plan state in Section 9 that based on the assessment of the flood hazard and the lack of repetitive loss properties, the Town of Jay does not need any flood mitigation action.				X

<p>B. For each jurisdiction, has the local governing body adopted the plan?</p>	<p>Section 10 Exhibit 9 (Later)</p> <p>Section 3, p. 10; Section 10</p>	<p>This is the initial submission of the Santa Rosa County FMA Plan. At least one participating jurisdiction must formally adopt the Plan within one calendar year of receipt of the FEMA "Approval Pending Adoption" notification.</p> <p><u>REQUIRED:</u></p> <p>The Plan must be adopted within one calendar year of FEMA's "approval pending adoption" of the FMA Plan.</p> <p><u>RECEIVED:</u></p> <p>All participating jurisdictions have adopted the FMA Plan.</p>				<p>X</p>			
<p>C. Is supporting documentation, such as a resolution, included for each participating jurisdiction?</p>	<p>Section 10 Exhibit 9 (Later)</p> <p>Section 3, p. 10; Section 10</p>	<p>This is the initial submission of the Santa Rosa County FMA Plan. The Plan shall include a copy of the completed and signed resolution or other documentation of formal adoption for each participating jurisdiction.</p> <p><u>REQUIRED:</u></p> <p>The Plan shall include a copy of the resolution or other documentation of formal adoption of the FMA Plan within one calendar year.</p> <p><u>RECEIVED:</u></p> <p>All participating jurisdictions have submitted documentation adopting the FMA Plan.</p>				<p>X</p>			
<p>SUMMARY SCORE</p>									<p>X</p>

Multi-Jurisdictional Planning Participation

- **Multihazard 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.*
- **FMA Requirement §78.5(a):** *Description of the planning process and public involvement. Public involvement **may** include workshops, public meetings, or public hearings.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			NOT MET	MET	NOT MET	MET
A. Does the plan describe how each jurisdiction participated in the plan's development?	Section 3 Section 3	Task Force representation from each jurisdiction. Extensive effort to inform public about meetings and obtain input during all aspects of plan development. The Flood Mitigation Plan Task Force was formed to develop the FMA plan. Each jurisdiction was represented on the Task Force. The roles and responsibilities of the Task Force are described in Section 3				X
SUMMARY SCORE						X

PLANNING PROCESS:

Documentation of the Planning Process

- **Multihazard Requirement §201.6(b):** *An open public involvement process is essential to the development of an effective plan. 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.*
- **Multihazard 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.*
- **FMA Requirement §78.5(a):** *Description of the planning process and public involvement. Public involvement **may** include workshops, public meetings,*

or public hearings.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan provide a narrative description of the process followed to prepare the plan?	Section 3 Exhibits 2 & 4 Section 3	Good interagency coordination, multiple formats used to inform the public about opportunities to participate in the planning process. Section 3 of the FMA plan describes the process followed to prepare the plan. The Task force followed a 4-phase mitigation planning process, described in the text.				X
B. Does the plan indicate who was involved in the 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.?)	Section 3 Section 4 Exhibit 1 Section 3	Good documentation of key participating parties during in the process. Also noted are Section 8, Public Participation, and Exhibit 6, efforts to request public comment on the plan. The Flood Mitigation Plan Task Force was charged with plan development. The membership of the Task force is included in the plan. The plan was prepared by CRS Max Consultants, Inc.				X

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
C. Does the 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?)	<p>Section 3 Exhibits 2 thru 7</p> <p>Section 3, pp. 6-10; Appendix A, Exhibits 2-5</p>	<p>Excellent documentation of public involvement in all phases of plan development.</p> <p>Over half the members of the Task Force were from the public, including residents impacted by flooding. Public meetings were held in various areas to solicit input from the public. A questionnaire was utilized to gather information for the plan. However, the plan does not describe how the public had the opportunity to review and comment on the final plan prior to approval.</p> <p>Required Revision:</p> <p>The updated Plan must indicate how the public was provided an opportunity to comment on the plan prior to final plan approval.</p> <p>Revision Received:</p> <p>Prior to approval, the final FMA Plan was available on the Santa Rosa County website for public review. A public meeting was held on 2/10/2011 to allow the public to comment on the FMA Plan prior to adoption.</p>				X
D. Was there an opportunity for neighboring communities, agencies, businesses, academia, nonprofits, and other interested parties to be involved in the planning process?	<p>Section 3 Section 4 Exhibits 3, 5 – 7</p> <p>Section 3, pp. 9-10; Exhibit 3</p>	<p>Excellent documentation of agencies involvement in all phases of plan development.</p> <p>Letters were sent to other interested parties inviting them to participate in the planning effort. Neighborhood groups, homeowners' associations, and Chamber of Commerce were included. Members of the Task force came from the American Red Cross, Florida state departments, and Backwater SWCD.</p>				X
E. Does the planning process describe the review and incorporation, if appropriate, of existing plans, studies, reports, and technical information?	<p>Section 2 Sect 4.1 Appendix 2</p>	<p>Relevant goals, policies, and objectives from various jurisdictions and levels of plans are inserted in Appendix B.</p>				X

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
	Section 4, p.2; Appendix 2	Section 4 of the FMA plan lists documents that were examined during the development of the plan. Appendix 2 describes the documents in detail.				
SUMMARY SCORE						X

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.*

Identifying Hazards

- **Multihazard 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.*
- **FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk, including estimates of the number and type of structures at risk, repetitive loss properties, and the extent of flood depth and damage potential.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan include a description of the types of all natural hazards that affect the jurisdiction? If the hazard identification omits (without explanation) any hazards commonly recognized as threats to the jurisdiction, this part of the plan cannot receive a Satisfactory score. Consult with the State Hazard Mitigation Officer to identify applicable hazards that may occur in the planning area.	Section 5, Pages 1 – 8 Appendices C, D, E, H, J, N Section 5, pp. 1-8	Good description of flood risk types, and flood events that sets the stage for addressing flood mitigation needs. The FMA plan includes a detailed description of the Flood hazard, including all the possible sources of a flood event.				X
SUMMARY SCORE						X

Profiling Hazards

- **Multihazard 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.*
- **FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk,, and the extent of flood depth and*

damage potential.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the risk assessment identify the location (i.e., geographic area affected) of each natural hazard addressed in the plan?	Section 5, pgs 1-8 pages 10-19 Section 6, pgs 3-13 pages 27-28 Section 5; Appendix C, D, E	Good description of flood risk types, and flood events that sets the stage for addressing flood mitigation needs and summary of geographical areas subject to Repetitive Loss properties. The FMA plan describes the locations affected by the various types of flooding events that can occur. Maps are provided to supplement the text.				X
B. Does the risk assessment identify the extent (i.e., magnitude or severity) of each hazard addressed in the plan?	Section 5, pgs 10-19 Appendices D, E, N Section 5, pp. 15-23	Good coverage of storm/flood events, areas impacted, water levels, and damage costs. "Extent" is a description of how bad a hazard event can be. Information about Extent is provided for each type of flooding event. Data includes tide depth associated with hurricanes and flood depth for riverine flooding.				X
C. Does the plan provide information on previous occurrences of each hazard addressed in the plan?	Sect 5, pgs 10-19 Sect 6, page 6 Section 5, pp. 15-23	Good coverage of storm/flood events, areas impacted, water levels, and damage costs. The FMA plan provides information on previous flood occurrences dating back to 1917, through 2009.				X
D. Does the plan include the probability of future events (i.e., chance of occurrence) for each hazard addressed in the plan?	Section 5 Pages 6, 8, 9 Section 5, pp. 9-12	The plan provides generic information from nationally available sources. Information, or sources of information, is needed to assess probability for future events. The FMA plan includes the probability of future events that generate flooding, including hurricanes and severe storms. Probability of flooding in Santa Rosa County comes from the State of Florida Enhanced Hazard Mitigation Plan. A map describes the 100-year floodplain in Santa Rosa County.				X
SUMMARY SCORE						X

Assessing Vulnerability: Overview

- **Multihazard 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.*
- **FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk, ..., and the extent of flood depth and damage potential.*

Element	Location in the Plan (section or annex and page #)	Reviewer’s Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan include an overall summary description of the jurisdiction’s vulnerability to each hazard?	Section 6 Appendices D, E, L, M, N Section 6, pp. 1-3	General information provided with detailed descriptions of vulnerability for key neighborhoods in the unincorporated areas only. Data on the number of Repetitive Losses is provided by neighborhood. The FMA plan offers a general description of vulnerability to the Flood hazard. Vulnerability to the different occurrences causing a flood event is described.				X
B. Does the plan address the impact of each hazard on the jurisdiction?	Sections 6.5, 6.6 Section 6, pp. 19-37	General cost impacts are summarized by Key Occupancies, but not aggregated to hazards or jurisdictions. The FMA plan provides estimated values for the types of structures vulnerable to the Flood hazard. The number of structures exposed to storm surge and flooding is included, along with a discussion of vulnerable critical facilities.				X
SUMMARY SCORE						X

Assessing Vulnerability: Identifying Structures

- **Multihazard 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*
- **FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk, including estimates of the number and type of structures at risk, repetitive loss properties,....*

Element	Location in the Plan (section or annex and page #)	Reviewer’s Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan describe vulnerability in terms of the	Sections 6.5, 6.6	Brief description of nature of impacts provided, and				

<p>types and numbers of existing buildings (including repetitive loss structures), infrastructure, and critical facilities located in the identified hazard areas?</p>	<p>Section 6.7, pages 29-30, Appendices E, H, J, K, M, N</p> <p>Section 6, pp. 29-37</p>	<p>tabular information is provided on impacts in several tables in units of estimated values, acreage, number of establishments, type of employer, and occupancy type, but not in the number of existing buildings. Still the plan provides a good assessment of vulnerability.</p> <p>The FMA plan includes information on the types and numbers of structures located in the various flood hazard areas. Information is broken out for storm surge events and flood (100-year and 500-year) events.</p>				<p>X</p>
<p>B. Does the plan describe vulnerability in terms of the types and numbers of future buildings, infrastructure, and critical facilities located in the identified hazard areas?</p>	<p>Sections 6.7, 6.11 Appendix P</p> <p>Section 6, pp. 34-36</p>	<p>Description impacts and future land uses is provided, and tabular information is provided on impacts in units of acreage for future land use and value. However, no information is provided on the anticipated vulnerability in terms of numbers of future buildings, infrastructure and critical facilities.</p> <p>FEMA concurs with the comments of the state reviewer. Information is provided on future acreage use, not in terms of types and numbers of future structures.</p> <p>Recommended Revision: In a future update of the FMA plan, describe vulnerability in terms of types and numbers of future structures for each jurisdiction.</p>			<p>X</p>	
<p>SUMMARY SCORE</p>						<p>X</p>

Assessing Vulnerability: Estimating Potential Losses

- **Multihazard 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)(i)(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			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan estimate potential dollar losses to vulnerable structures?	Sections 6.6, 6.7 Section 6	Data is summarized in tables for structures in the SFHA and dollar losses in total Fair Market Value. Potential dollar losses for "vulnerable" structures appears to be missing. The FMA plan provides information on potential dollar losses for structures in unincorporated Santa Rosa county, but no information for the other jurisdictions. Information on dollar losses for future structures is provided for unincorporated Santa Rosa County and the City of Milton only. Recommended Revision: In a future revision of the FMA plan, include potential dollar loss estimates for both existing and future vulnerable structures in all jurisdictions			X	
B. Does the plan describe the methodology used to prepare the estimate?	Section 6, pgs 15, 24-25, Appendix N Section 6, pp. 29-30	Methodology is not explained, but this section references data provided through HAZUS-MH, from Property Appraisers Office and DCA. No description of methodology used or how other sources may have been utilized. More specific HAZUS-MH is cited as the source of data for dollar estimates, along with the Santa Rosa County Property Appraiser. However, dollar loss estimates were not provided for all vulnerable structures, both existing and future (see Element A above). Once these estimates are provided, the methodology used should be described.			X	
SUMMARY SCORE					X	

Assessing Vulnerability: Analyzing Development Trends

- **Multihazard 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			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan describe land uses and development trends?	Section 6.11 Appendix P Section 6, pp. 49-54; Appendix P	Reference is made to the Local Comp Plan and Future Land Use element and maps, but states that limiting density from coastal flood hazard areas has met with resistance and legal challenge. Recommendations should be added that addresses how new development is mitigated through policies & strategies. The FMA plan discusses land use and development trends for the jurisdictions. Appendix P contains the future Land Use map for Santa Rosa County.				X
SUMMARY SCORE						X

Multi-Jurisdictional Risk Assessment

- **Multihazard 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.*
- **FMA FEMA 299 Guidance:** *The Plan should be coordinated with, and ideally developed in cooperation with, all of the local jurisdictions within the geographical area.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S

<p>A. Does the plan include a risk assessment for each participating jurisdiction as needed to reflect unique or varied risks?</p>	<p>Section 5 Appendices C, D, E, H, J, M LMS, Section 5</p> <p>Section 5</p>	<p>General risk assessment information is provided in the plan for neighborhoods substantially located in SFHAs, and on maps depicting flood prone areas. The plan could be strengthened by discussing specific jurisdictional risks based on historical trends, and consideration of other geographical sources of information that could be used to assess unique and varied risks by jurisdiction.</p> <p>The FMA plan does include an assessment of the flood risk for each participating jurisdiction. Areas affected by specific river systems are discussed. The Town of Jay is not affected by storm surge.</p>				<p>X</p>			
SUMMARY SCORE									<p>X</p>

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.*

Local Hazard Mitigation Goals

- **Multihazard 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.*
- **FMA Requirement §78.5(c):** *The applicant’s floodplain management goals for the area covered by the plan.*

Element	Location in the Plan (section or annex and page #)	Reviewer’s Comments	SCORE						
			STAFFORD		FMA				
			N	S	N	S			
<p>A Does the plan include a description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards? (GOALS are long-term; represent what the community wants to achieve, such as “eliminate flood damage”; and are based on the risk assessment findings.)</p>	<p>Section 7</p> <p>Section 7</p>	<p>Three goals and eleven objectives are listed without explanation as to how they may be derived from the risk assessment findings. A short description on how the goals and objectives were generated and how they were used to develop Activities and Actions in Sections Eight and Nine would strengthen the plan.</p> <p>The FMA plan includes 3 goals intended to reduce or eliminate vulnerabilities to the Flood hazard. Each goal has at least 3 supporting objectives that form a strategy to meet the goal.</p>				<p>X</p>			
SUMMARY SCORE									<p>X</p>

Identification and Analysis of Mitigation Actions

- **Multihazard 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.*
- **FMA Requirement §78.5(d):** *Identification and evaluation*
- *n of cost-effective and technically feasible mitigation actions considered.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan identify and analyze a comprehensive range of specific mitigation actions and projects for each hazard?	Section 9 Appendix I, Q, R Section 9, pp. 1-14	The Section Nine action plan provides activities recommended by the Flood Mitigation Task Force. Appendix I describes seven mitigation projects, Appendix Q describes public outreach, and Appendix R contains post disaster mitigation policies and procedures. The plan should describe how actions were developed and tie them to the Goals and Objectives in Section Seven as well as ensure that priorities are based on priority needs rather than availability of anticipated or available funding. The plan contains a number of mitigation actions directed at reducing or eliminating vulnerability to the Flood hazard. The goal and objective achieved by each action is identified.				X
B Do the identified actions and projects address reducing the effects of hazards on new buildings and infrastructure?	Section 9 Section 9, pp. 1-14	Numerous actions, recommended by the Flood Mitigation Task Force, address minimizing threats to new buildings, however, timeframes are generally left open because they are dependent upon availability of funding. Most tasks have a designated coordinator for implementation. See note A above. The identified actions include those that will reduce the effects of flooding on new structures. They include: <ul style="list-style-type: none"> • Public information • Stormwater management 				X

		<ul style="list-style-type: none"> • Drainage • Update FIRMs 				
C. Do the identified actions and projects address reducing the effects of hazards on existing buildings and infrastructure?	Section 9	Numerous actions, recommended by the Flood Mitigation Task Force, address minimizing threats to existing buildings, however, timeframes are frequently left open because they are dependent upon availability of funding. Most tasks have a designated coordinator for implementation. See note A above.				
	Section 9, pp. 1-14	The identified actions include those that will reduce the effects of flooding on new structures. They include: <ul style="list-style-type: none"> • Facilities retrofit • Public information • Stormwater management • Drainage • Update FIRMs • Reduce number of repetitive flood loss properties 				X
SUMMARY SCORE						X

Implementation of Mitigation Actions

- **Multihazard 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.*
- **FMA Requirement §78.5(d):** *Identification and evaluation of cost-effective and technically feasible mitigation actions considered; and*
- **FMA Requirement §78.5(e):** *Presentation of the strategy for reducing flood risks and continued compliance with the NFIP, and procedures for ensuring implementation, reviewing progress, and recommending revisions to the plan.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the mitigation strategy include how the actions are prioritized ? (For example, is there a discussion of the process and criteria used?)	Section 9, Page 1	Actions are prioritized based roughly on effectiveness to mitigate flooding, feasibility and affordability, and ability to reduce repetitive losses. The plan should describe how actions were developed and tie them to the Goals and Objectives in Section Seven as well as ensure that priorities are				

	Section 9, p. 1	<p>based on priority needs rather than availability of anticipated or available funding.</p> <p>The mitigation actions are ranked based upon 4 criteria:</p> <ol style="list-style-type: none"> 1. Overall effectiveness to mitigate flooding 2. Feasibility and affordability 3. Reduction of repetitive losses 4. Urgency of need 				X
B. Does the mitigation strategy address how the actions will be implemented and administered ? (For example, does it identify the responsible department, existing and potential resources, and timeframe?)	Section 9	<p>In most cases the actions are delegated to a specific and appropriate program area, and time frame is set where funding is determined. Many of the tasks are unfunded and timeframe would be based on receipt of alternative county funding sources (e.g. grants). See note A above.</p>				X
	Section 9	<p>The description of each mitigation action includes the responsible party, budget, and timeframe for completion.</p>				
B.1. Does the mitigation strategy address continued compliance with the NFIP?	Section 9, page 12	<p>Action Statement 44 includes continued participation in NFIP and with improved CRS class ratings, while updating F.P. ordinances responsive to new FIRMS.</p>				
	Section 9, p. 14	<p>Action 44 specifically addresses continued compliance with the NFIP and CRS. Improving the CRS classification is part of this effort.</p>				X
C. Does the prioritization process include an emphasis on the use of a cost-benefit review (see page 3-36 of <i>Multi-Hazard Mitigation Planning Guidance</i>) to maximize benefits?	Section 9, p. 1	<p>Somewhat, actions are prioritized based roughly on effectiveness to mitigate flooding, feasibility and affordability, and ability to reduce repetitive losses. See note A above.</p> <p>Feasibility and affordability is one of the criteria used to rank projects. Reduction of repetitive losses is another criterion which is cost effective.</p>				X
C.1. Does the mitigation strategy emphasize cost-effective and technically feasible mitigation actions?	Section 9 Appendices I, Q, R	<p>Yes, this is one of three criteria for ranking projects</p>				
	Section 9, p. 1	<p>Feasibility and affordability is a ranking criterion. Action 2 specifically calls for cost effective drainage actions.</p>				X

SUMMARY SCORE				X
---------------	--	--	--	---

Multi-Jurisdictional Mitigation Actions

- **Multihazard 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.
- **FMA FEMA 299 Guidance:** The Plan should be coordinated with, and ideally developed in cooperation with, all of the local jurisdictions within the geographical area.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A Does the plan include at least one identifiable action item for each jurisdiction requesting FEMA approval of the plan?	Section 9, Page 3 Section 9	Action items are listed for unincorporated Santa Rosa County, City of Milton and City of Gulf Breeze to whom the plan is targeted. The Town of Jay has not been addressed in the plan and therefore, no action items have been identified. Action items for the flood hazard are included for jurisdictions covered by the plan.				X
SUMMARY SCORE						X

PLAN MAINTENANCE PROCESS

Monitoring, Evaluating, and Updating the Plan

- **Multihazard 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.
- **FMA Requirement §78.5(e):** Presentation of the strategy for reducing flood risks and continued compliance with the NFIP, and procedures for ensuring implementation, reviewing progress, and recommending revisions to the plan.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan describe the method and schedule for monitoring the plan? (For example, does it identify the party responsible for monitoring and include a schedule for reports, site visits, phone calls, and meetings?)	Section 11 Section 11	Annual evaluation report will be developed by staff and submitted for review and consideration by the Flood Mitigation Plan Task Force. The Floodplain Manager and Grants and Special Projects Coordinator will gather information to be presented to the Flood Mitigation Task Force. Information to be presented is identified in the plan.				X

<p>B. Does the plan describe the method and schedule for evaluating the plan? (For example, does it identify the party responsible for evaluating the plan and include the criteria used to evaluate the plan?)</p>	<p>Section 11</p> <p>Section 11</p>	<p>Yes, annually.</p> <p>The Flood Mitigation Plan Task Force will meet annually in August to review and evaluate the plan. The final Flood Mitigation Plan Evaluation Report will be adopted by the Task Force and submitted to the County commission.</p>				<p>X</p>
<p>C. Does the plan describe the method and schedule for updating the plan within the five-year cycle?</p>	<p>Section 11</p> <p>Section 11</p>	<p>The plan will be updated as needed annually based on the evaluation report and Task Force findings.</p> <p>Any recommended plan revisions will be presented to the County Commission annually. If the County Commission adopts any recommended revisions, the plan will be updated accordingly. No provisions are made in the plan for a 5-year update.</p> <p><u>Recommended Revision:</u> Include in the plan a method and schedule for updating the plan on a 5-year cycle.</p>			<p>X</p>	
<p>SUMMARY SCORE</p>						<p>X</p>

Incorporation into Existing Planning Mechanisms

- **Multihazard 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			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan identify other local planning mechanisms available for incorporating the requirements of the mitigation plan?	Section 9 Pages 1, 5,10 Section 2, page 1 Section 4	Other mechanisms include: Floodplain ordinance, County Housing Program, EAR-Local Comp Plan-Coast Management Element, and the county's LMS. While the plan discusses in Section 4 "Coordination With Other Agencies, it never clearly identifies other local planning mechanisms <u>into which</u> requirements of the plan can be incorporated. Documents that were reviewed for information to include in the plan are listed. Recommended Revision: Identify other local planning mechanisms into which requirements of the plan can be incorporated.			X	
B. Does the plan include a process by which the local government will incorporate the requirements in other plans, when appropriate?	Section 9 Pages 1, 5, 10 Section 4	The Mitigation Plan will be incorporated in various plans and program such as Floodplain ordinance, County Housing Program, EAR-Local Comp Plan-Coast Management Element when updates occur. The plan does not clearly identify other local planning mechanisms <u>into which</u> requirements of the plan can be incorporated. As a result, no process for doing so is included. Recommended Revision: Identify other local planning mechanisms into which requirements of the plan can be incorporated and a process by which to do so..			X	
SUMMARY SCORE					X	

Continued Public Involvement

- **Multihazard 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			
			STAFFORD		FMA	
			N	S	N	S
A. Does the 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?)	Section 11 Section 11	Annual evaluation report will be developed by staff and submitted for review and consideration by the Flood Mitigation Plan Task Force. The annual Flood Mitigation Plan Evaluation Report will be submitted to the County Commission no later than the second meeting in September, as well as released to the media and made available to the public.				X
SUMMARY SCORE						X