

LOCAL MITIGATION PLAN REVIEW TOOL HHPD FY2020

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 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*.

Jurisdiction: Huntingdon County, Pennsylvania	Title of Plan: 2020 Huntingdon County Multi- Jurisdictional Hazard Mitigation Plan Update	Date of Plan: September 11, 2020 December 2, 2020 revisions January 28, 2021 revisions
Local Point of Contact: Joe Thompson	Address: 223 Penn Street Huntingdon PA 16552	
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State Reviewer: Ernest Szabo	Title: State HM Planner	Date: 9/28/20
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FEMA Reviewer: Matt McCullough	Title: Community Planner	Date:
Date Received in FEMA Region <i>(insert #)</i>		
Plan Not Approved		
Plan Approvable Pending Adoption		
Plan Approved		

**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.

1. REGULATION CHECKLIST	Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)			
ELEMENT A. PLANNING PROCESS			
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))	Pg. 16-27 Appendix C	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))	Pg. 16-24 Appendix C	X	
A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))	Pg. 25-27 Appendix C	X	
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))	Appendix A Pg. 178-187	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))	Pg. 261	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))	Pg. 259-261	X	

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
ELEMENT A: REQUIRED REVISIONS				
A1.) Pg. 18-21 Table 3.1-1 Question: Does a check in the Risk Assessment and Mitigation Solution Workshop column, indicate that the community participated in all three offerings (May 13 th , 20 th , & 26 th)?				
The check indicates that the community participated in one of the three offerings based upon their availability. The same presentation was given at each meeting, but three dates were provided in order to increase municipal participation.				
A3.) Question: Did you receive responses from the opportunity for public comment?				
The public was invited to attend the March 5, 2020, Kickoff Meeting and/or to provide input to the County EMA office via a newspaper article in <i>The Daily News</i> . Likewise, an invitation to the meeting was posted on the County's homepage.				
Similarly, the County posted an invitation to the May 13, 2020, RAMS Meeting on their HMP page, and the consultant posted the invitation to the project website.				
The public was also invited to the Draft Plan Review Meeting on July 15, 2020, held at the Bailey Building and virtually via GoToMeeting. Invitations for the public to attend the Draft Plan Review Meeting and/or to review the plan were extended through the meeting notice in <i>The Daily News</i> , the County website homepage, the County HMP page, the County Facebook page, the County Twitter account, the EMA Facebook page, the EMA Twitter account, and the project website. However, as stated at the end of Section 3.3, no comments were received during the Draft Plan review period. In fact, no comments were received from the general public at any point in the update, which has now been clarified in the MJHMP text.				
A6.) Pg. ii- Recommendation: Identify an existing annual meeting and schedule the annual plan review in conjunction with that opportunity.				
Thank you for the suggestion, which the County will take under consideration for annual updates. Action 7 is to "Integrate the 5-year maintenance cycle of the Multi-Jurisdictional Hazard Mitigation Plan with both the 10-year and biennial review and maintenance cycles of the County Comprehensive Plan and County Regional Emergency Operations Plan, respectively." Additionally, MJHMP updates are provided at the bi-monthly Local Emergency Planning Committee meetings and at the monthly Huntingdon County Planning Commission meetings, which has now been noted in Section 7.2.				
ELEMENT B. HAZARD IDENTIFICATION AND RISK ASSESSMENT				
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))	Pg. 36-177	X		
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))	Pg. 36-177	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))	Pg. 36-177	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))	Pg. 63 Table 4.3.3-3	X		

ELEMENT B: REQUIRED REVISIONS

Required Revision:

B1.) Pg. 35, Drought Location- no map or description as to the area affected within the planning area by drought hazard. For example, which area within the 2 months (11/2016 – 12/2016) were affected? Is there a map or a description as to what exactly is the South Central Mountains region of Pennsylvania?

The dates referenced in FEMA's comment are in Table 4.3.1-3. An addition was made to the text above this table: "As shown in Figure 4.3.1-1, the South Central Mountains region includes Bedford, Blair, Cambria, Fulton, and Huntingdon counties."

Question:

B2.) Pg. 40, Drought Probability: It is noted as *Unlikely*. However, on pg. 40 it is stated that "Huntingdon County is under a drought warning or emergency between 10-15 percent of the time." Table 4.4.1 states that annual probability between 1%-49.9% would equal a *Possible* level of occurrence.

Thank you for the correction. The text in Section 4.3.1.4 has been changed from "unlikely" to "possible." The Probability value in Table 4.4.2-1: *Ranking of hazard types based on Risk Factor methodology* has been changed from "1" to "2" for Drought, and the calculated Risk Factor has been changed from "1.5" to "1.8" for Drought. As the table is sorted with the highest Risk Factor at the top and the lowest at the bottom, Drought was moved up but remains in the "Low" classification. Likewise, the Drought column was shifted left in Table 4.4.2-2 which was also sorted from high to low Risk Factor.

Required Revision:

B2.) Pg. 105, Provide the information for the sinkhole occurrences in Huntingdon County: date, location, damages, etc....

The *Sinkhole Inventory Database* mentioned in Section 4.3.9.3 is for an online map, which shows approximate locations but does not provide data either by clicking or exporting. Data such as date, location, and damages also were not identified through the websites of the PA Department of Conservation & Natural Resources, the PA Department of Environmental Protection, the PA Spatial Data Access (PASDA) Geospatial Data Clearinghouse, or the Huntingdon County Conservation District, or through the list of Risk Assessment Hazard Data Sources in the PA HMP Standard Operating Guide.

Required Revision:

B2.) Pg. 119, Figure 4.3.11-1 states that it represents Wildfire occurrences from 2002-2015. However, the Source of Data in the bottom right notes it is a DCNR 2017, 2018 and 2020 document. Table 4.3.11-1 on Pg. 118 notes events report from 2014-2019. Need to clarify.

As stated in the text, Table 4.3.11-1 represents the most current and comprehensive list of wildfire occurrences available for the region surrounding Huntingdon County, with data provided from 2014-2019.

Figure 4.3.11-1 provides the most recent available GIS data for wildfire origins classified by fire size, which unfortunately was not as current, and was only available for 2002-2015. As for the data sources, DCNR provided various shapefiles for the map, including state forests and state parks.

Additional text was added to clarify that the table and map represent different criteria and that both use the most recent / best available data.

Recommended Revision:

B2.) Pg. 216, Landslide- Mitigation action No. 17: Begin the tracking and inventorying of landslide occurrences and impacts throughout the County. Possibly explore other Funding Sources to aid in this

project's completion: I.e.- HMGP 5% initiative funds, County-wide public information collection strategy on occurrences and impacts; using smart phone technology to capture damages and locations.

Thank you. These additional funding ideas have been added to Table 6.4-1.

Question:

B3.) Pg. 43 Drought Loss: Has there been any agricultural losses due to this hazard?

Droughts have caused agricultural losses in Huntingdon County. However, tabulations could not be identified in the NOAA Storm Events Database, where the Crop Damage Estimate was entered as \$0.00K for all events in the database. Likewise, agricultural losses in Huntingdon County caused by drought could not be readily identified in the Census of Agriculture for Huntingdon County, the 2018 State HMP, the Pennsylvania Department of Environmental Protection drought resources site, the USDA National Agricultural Statistics Service, the National Integrated Drought Information System, or the National Drought Mitigation Center.

An article by PennState Extension titled "Crop Insurance for Pennsylvania Field Crops" (August 3, 2020) states the following:

In recent years, around \$500 million in crop insurance protection has been purchased by agricultural producers annually in Pennsylvania. Nearly \$400 million has been paid to farmers for losses in the past ten years. Drought is the largest cause of loss in agronomic crops (45%), followed by excess moisture (32%).

<https://extension.psu.edu/crop-insurance-for-pennsylvania-field-crops>

Required Revision:

B3.) Pg. 49 Extreme Temperatures: What is the demographic makeup (age) of the communities within the County? Which communities are at greater risk due to their make up?

Demographic information has been added to Section 4.3.2.5 Vulnerability Assessment (page 50), with the new addition shown below in italics.

"The NOAA National Weather Service (2001) preparedness guide titled "Winter Storms: The Deceptive Killers," determined that 50 percent of injuries related to cold temperatures occur in people over 60 years old, more than 75 percent happen to males, and about 20 percent occur in the home. As discussed in Section 2.3, the County's population has aged at a rapid pace since 2000, more than the rest of the United States. The County has seen a decline in the 18 and under population, as well as an increase in the 65 and older population, with a median age of 43 (Alleghenies Ahead, 2018). An estimated 27% of the population in Huntingdon County is age 60 and over, and 20% is age 65 and over (U.S. Census Bureau, 2018). Juniata Township has the most aged population, as a percentage, with 43.9% aged 60 and older and 31.8% aged 65 and older (U.S. Census Bureau, 2018). Union Township follows close behind, with 43.7% aged 60 and older and 34.1% aged 65 and older (U.S. Census Bureau, 2018)."

Required Revision:

B3.) Pg. 96 – Landslide- Provide a map of State/County routes throughout the County.

A reference has been added on page 96, to Figure 4.3.18-1 in the Transportation Accidents hazard profile.

Required Revision:

B3.) Pg. 115- Tornado- It is noted that "all structures and infrastructure might be exposed to the effects of tornado or other high winds." Additional specificity of at-risk structures/population is required, as it relates to the identification of community assets. (Manufactured housing is noted as being particularly vulnerable.)

Table 4.3.10-5: *Mobile Homes as Percent Occupied Housing Units by Municipality* has been added, as well as text citing the municipalities with highest percentages of mobile homes, in Section 4.3.10.5 Vulnerability Assessment.

Required Revision:

B3.) Pg. 120 - Wildfire- Additional specificity of at-risk structures/population is required, as it relates to the identification of community assets.

As stated in Section 4.3.11.5 Vulnerability Assessment, “The PADCNR-BOF has conducted an independent wildfire hazard risk assessment for the various municipalities across Huntingdon County. Results of that assessment are shown in Figure 4.3.11-2. Wildfire hazard is defined based on conditions that affect wildfire ignition and/or behavior such as fuel, topography and local weather. Based on this assessment, 33 jurisdictions have a high wildfire rating. Ten municipalities within Huntingdon County have a medium wildfire hazard potential. Five jurisdictions, all of which are Boroughs, are considered to have low wildfire hazard potential.”

Text has been added regarding the population, total structures, and critical facilities for both the county and the highest municipality.

Kudos: Pg. 127-128 Winter Storm- Solid identification of vulnerabilities throughout the County.

Required Revision:

B4.) Pg. 62- The data used for Table 4.3.3-3 is over 2 years old from the start of the planning process. Please request and use an updated RL listing.

Data from January 2021 has now been incorporated into Table 4.3.3-3.

Question: P. 27 states that “*The Huntingdon County HMPT reviewed the hazards profiled in the 2015 Huntingdon County Multi-Jurisdictional Hazard Mitigation Plan Update during the March 5 Kick-Off Meeting. The HMPT determined that 19 of the existing hazards should be continued into the plan update and decided that one additional hazard should be profiled in the 2020 plan update: Invasive Species.*” It does not discuss why some hazards (lightning, radon, nuclear incidents, volcanic events, mineral mining) were dropped. Doesn’t need detailed discussion but a short paragraph on why not retained would be helpful.

The 2015 MJHMP included 25 hazard profiles, but several were as brief as half a page or just a few pages. The HMPT wanted to eliminate some of the extraneous hazard profiles that are least relevant to Huntingdon County and instead focus on those that truly reflect the challenges that the County faces in terms of how common and/or potentially devastating each hazard is. For example, the Pennsylvania Emergency Management Agency (PEMA) Standard Operating Guide (SOG) (2020 draft) did not include two of the hazards that had been in the 2015 MJHMP, volcanic events and mineral mining, so these two hazard profiles were eliminated. Lightning, radon, nuclear incidents, and earthquake was also dropped following discussion among the HMPT at meetings and via the Evaluation of Identified Hazards and Risk worksheet. Through this participation the HMPT indicated that the threat posed by invasive species had increased in recent years and should be added to the MJHMP, resulting in a total of 20 hazard profiles in the 2020 plan update.

Explanatory text has been added to Section 4.1 on page 27.

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
<u>Comment:</u> Kudos - Included hazard impact on historical structures				
<u>Question:</u> Invasive species #1 hazard? Five page risk profile with no quantified losses? Worse than pandemic?				
Invasive Species was ranked with a Risk Factor of 3.2, and Pandemic/Infectious Disease was ranked with a Risk Factor of 3.1. The pandemic is short lived, but the County has so much agricultural and forested land that the HMPT sees this as a higher risk with a longer-term impact and potentially a more costly impact.				
Huntingdon County was added to the quarantine zone for the spotted lanternfly in 2020, so impacts from this species will likely be quantified in the next plan update. In fact, Action 114 is to “Collect and analyze data on specific impacts the invasive spotted lantern fly has on Huntingdon County and its municipalities to include in the 5-year update of the Multi-Jurisdictional Hazard Mitigation Plan.”				
ELEMENT C. MITIGATION STRATEGY				
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))	Pg. 178-193 Appendix C Pg. 192-193	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))	Pg. 66-67 Pg. 184-187 Appendix C	X		
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))	Pg. 210-211	X		
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))	Pg. 211-258	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))	Pg. 211-258	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))	Pg. 192-193	X		

ELEMENT C: REQUIRED REVISIONS

C2.) Required Revision:

Only 6 communities provided a response for the NFIP Survey. Reference pg. 18, Table 3.1-1

The NFIP Survey was provided as a handout and in-meeting exercise at the March 5, 2020, Kick Off Meeting. In April 2020 the consultant called each municipality to discuss the importance of attending future meetings and filling out the various forms provided; after the call, a hard copy of each form was mailed to each municipality. The consultant reminded the municipal officials during each subsequent call to complete forms. All of the forms were also posted to the HMP project website, which encouraged the municipalities to complete the forms. Likewise, County staff emailed the municipalities several times to encourage meeting attendance and completion of all forms. Seven municipalities and the County completed the NFIP Survey. Also, per the consultants' discussions with County staff, it was determined that response rates were being adversely impacted by the pandemic and the lockdown that resulted in municipal buildings being unstaffed.

C4.) Recommended Revision:

Pg. 216, Mitigation Actions No. 17: "Collect and analyze data on specific impacts....." throughout the County. Possibly explore other Funding Sources to aid in this strategy's completion: I.e.- HMGP 5% initiative funds, County-wide public information collection strategy on occurrences and impacts; using smart phone technology to capture damages and locations.

Thank you. These additional funding ideas have been added to Table 6.4-1.

C4.) Required Revision:

Pg. 211 Each jurisdiction must have an associated action for each hazard they are vulnerable to within the risk assessment.

Actions 1 through 50 as well as 100, 101, 104, and 115 will be led by the County, with many if not all, jurisdictions benefiting from the County's efforts on each individual action. In some instances, the County simply has more available resources to complete the actions than the individual municipalities do. **This has now been noted in the text.** Actions 51 through 99, as well as 102, 103, and 105 through 114 were provided by individual municipalities via close coordination throughout this MJHMP update process.

The County and the consultant provided guidance, examples, and encouragement in all three workshops, and many subsequent phone calls and emails to solicit new mitigation actions from each municipality. As summarized in participation Table 3.1-1, one or more new mitigation actions were received from nearly all municipalities. The County believes that the extensive coordination throughout the 2020 update represents a good faith effort and that the municipalities have provided all actions that they deem appropriate for each local community.

C4.) Discussion:

Pg. 212 Currently, there is no strategy identifying elevation, acquisition or relocation as a project for Huntingdon County or any jurisdictions in Huntingdon County. This means none of those communities are currently eligible to receive grant funding for those projects. This does not align with the Objectives laid out under Goal 1.

Action 116 has been added per language provided by Matthew McCullough: "Protect infrastructure and structures at-risk to flood through elevation, acquisition, relocation or retrofits." The Lead Agency/Department is noted as "County Planning and Development Department, All 48 local municipalities."

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
C4.) Discussion:				
Pg. 223 Action 44: This action refers to the “review, update or adopt(ion) of regulations governing construction to prevent wind damage”. An additional action is suggested to include the same approach to the annual review and update of regulations overseeing the floodplain. This also does not align with the Objectives laid out under Goal 1.				
Action 9 is for the County to “Prepare and enact stormwater management ordinances consistent with Act 167 Stormwater Management Plan.”				
Action 10 is for the County to “Ensure County and municipal subdivision and land development ordinances are consistent with Chapter 102 Erosion & Sedimentation Control requirements.”				
Action 11 is for the County to “Consider adopting a Countywide, post-disaster recovery and reconstruction ordinance using the model ordinance included in the APA/FEMA PAS Report No. 483/484.”				
Action 111 by Spruce Creek Township is to “Continue blight remediation and implement an ordinance for vacant properties” and addresses the flood hazard with CDBG grants identified as the funding source.				
A new action (115) has been added to the MJHMP that “The County and its municipalities will regularly review and update their respective floodplain regulations to include the required updates following FEMA flood map revisions.”				
ELEMENT D. PLAN REVIEW, EVALUATION, AND IMPLEMENTATION (applicable to plan updates only)				
D1. Was the plan revised to reflect changes in development? (Requirement §201.6(d)(3))	Pg. 10-13 Pg. 174-177	X		
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))	Pg. 194-210	X		
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))	Pg. 164-171 Pg. 194-210 Pg. 245-258	X		

1. REGULATION CHECKLIST

Regulation (44 CFR 201.6 Local Mitigation Plans)

Location in Plan
(section and/or
page number)

Met

Not
Met

ELEMENT D: REQUIRED REVISIONS

Discussion:

D2.) Pg.202 Why were actions 72, 75, 80 90, 103 Cancelled?

Action 72 for Carbon Township to “Repair stream banks and road shoulders” was canceled by municipal representative due to lack of funding.

Action 75 for Henderson Township regarding “Public warning system for Raystown Dam failure” and Action 90 for Mill Creek Borough regarding “Public warning system” were canceled because they were duplicative of Action 101 for the County to “Implement a public warning system to alert municipalities downstream from Raystown Dam, which include Huntingdon Borough, Smithfield Township, Juniata Township, Henderson Township, Mill Creek Borough, Brady Township, Union Township, Mapleton Borough, Mount Union Borough, Shirley Township, and Shirleysburg Borough.”

Action 80 for Jackson Township regarding “Fire hall currently in the floodplain” was canceled per the completion of the Mitigation Action Progress Report Form with a note from the municipal official that it “does not meet CBA requirements for a mitigation project.”

Action 103 for Huntingdon County for “Replacement of storm water management system currently in disrepair and construction of terra-cotta infrastructure in Petersburg Borough” was canceled by municipal representative due to lack of funding. They are replacing storm water system infrastructure piece-meal as funds are available.

ELEMENT E. PLAN ADOPTION

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))	N/A		
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))	N/A		

ELEMENT E: REQUIRED REVISIONS

OPTIONAL: HIGH HAZARD POTENTIAL DAM RISKS

HHPD1. Did Element A4 (planning process) describe the incorporation of existing plans, studies, reports, and technical information for eligible high hazard potential dams?	Appendix G	X	
HHPD2. Did Element B3 (risk assessment) address eligible high hazard potential dams in the risk assessment?	Appendix G	X	
HHPD3. Did Element C3 (mitigation goals) include mitigation goals to reduce long-term vulnerabilities from eligible high hazard potential dams that pose an unacceptable risk to the public?	Pg. 211	X	

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
HHPD4. Did Elements C4-C5 (mitigation actions) address HHPDs prioritize mitigation actions to reduce vulnerabilities from eligible high hazard potential dams that pose an unacceptable risk to the public?	Section 6.4-1	X		
<u>REQUIRED REVISIONS</u>				
HHPD4.) Required Revision:				
Pg. 212 No specific mitigation actions are noted for any community within the strategy section for Dam Failure.				
Action 20 is for the County and Juniata Township to “Collect and analyze data on the specific impacts a dam failure at the County’s Lake Raystown Dam would have on Huntingdon County and its municipalities to include in the 5-year update of the Multi-Jurisdictional Hazard Mitigation Plan.”				
Action 101 by the County is to “Implement a public warning system to alert municipalities downstream from Raystown Dam, which include Huntingdon Borough, Smithfield Township, Juniata Township, Henderson Township, Mill Creek Borough, Brady Township, Union Township, Mapleton Borough, Mount Union Borough, Shirley Township, and Shirleysburg Borough.”				
Although not related to HHPD, Action 51 by Barree Township is to “Stabilize dirt and gravel roads at Stone Valley Dam.” Action 67 by Rockhill Borough is to “Close all levee openings and ground hog holes in order to keep Black Log Creek and Jordan Run free of debris, as well as control erosion issues.” Action 76 by Mapleton Borough is to “Clean and dredge the Field’s Dam section of Scrub Run.” Also, Action 71 is for Dudley Borough to “Conduct a stormwater management study for levees and to improve waterways.”				
ELEMENT F. ADDITIONAL STATE REQUIREMENTS (OPTIONAL FOR STATE REVIEWERS ONLY; NOT TO BE COMPLETED BY FEMA)				
F1.				
F2.				
<u>ELEMENT F: REQUIRED REVISIONS</u>				

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 with respect to:

- *Involvement of stakeholders (elected officials/decision makers, plan implementers, business owners, academic institutions, utility companies, water/sanitation districts, etc.);*
- *Involvement of Planning, Emergency Management, Public Works Departments or other planning agencies (i.e., regional planning councils);*
- *Diverse methods of participation (meetings, surveys, online, etc.); and*
- *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:

- *Use of best available data (flood maps, HAZUS, flood studies) to describe significant hazards;*
- *Communication of risk on people, property, and infrastructure to the public (through tables, charts, maps, photos, etc.);*
- *Incorporation of techniques and methodologies to estimate dollar losses to vulnerable structures;*
- *Incorporation of Risk MAP products (i.e., depth grids, Flood Risk Report, Changes Since Last FIRM, Areas of Mitigation Interest, etc.); and*
- *Identification of any data gaps that can be filled as new data became available.*

Element C: Mitigation Strategy

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

- *Key problems identified in, and linkages to, the vulnerability assessment;*
- *Serving as a blueprint for reducing potential losses identified in the Hazard Identification and Risk Assessment;*
- *Plan content flow from the risk assessment (problem identification) to goal setting to mitigation action development;*
- *An understanding of mitigation principles (diversity of actions that include structural projects, preventative measures, outreach activities, property protection measures, post-disaster actions, etc);*
- *Specific mitigation actions for each participating jurisdictions that reflects their unique risks and capabilities;*
- *Integration of mitigation actions with existing local authorities, policies, programs, and resources; and*
- *Discussion of existing programs (including the NFIP), plans, and policies that could be used to implement mitigation, as well as document past projects.*

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:

- *Status of previously recommended mitigation actions;*
- *Identification of barriers or obstacles to successful implementation or completion of mitigation actions, along with possible solutions for overcoming risk;*
- *Documentation of annual reviews and committee involvement;*
- *Identification of a lead person to take ownership of, and champion the Plan;*
- *Reducing risks from natural hazards and serving as a guide for decisions makers as they commit resources to reducing the effects of natural hazards;*
- *An approach to evaluating future conditions (i.e. socio-economic, environmental, demographic, change in built environment etc.);*
- *Discussion of how changing conditions and opportunities could impact community resilience in the long term; and*
- *Discussion of how the mitigation goals and actions support the long-term community vision for increased resilience.*

B. Resources for Implementing Your Approved Plan

Ideas may be offered on moving the mitigation plan forward and continuing the relationship with key mitigation stakeholders such as the following:

- *What FEMA assistance (funding) programs are available (for example, Hazard Mitigation Assistance (HMA)) to the jurisdiction(s) to assist with implementing the mitigation actions?*
- *What other Federal programs (National Flood Insurance Program (NFIP), Community Rating System (CRS), Risk MAP, etc.) may provide assistance for mitigation activities?*
- *What publications, technical guidance or other resources are available to the jurisdiction(s) relevant to the identified mitigation actions?*
- *Are there upcoming trainings/workshops (Benefit-Cost Analysis (BCA), HMA, etc.) to assist the jurisdictions(s)?*
- *What mitigation actions can be funded by other Federal agencies (for example, U.S. Forest Service, National Oceanic and Atmospheric Administration (NOAA), Environmental Protection Agency (EPA) Smart Growth, Housing and Urban Development (HUD) Sustainable Communities, etc.) and/or state and local agencies?*

