



State of Florida

HAZARD MITIGATION PLAN

Section 5 Local Mitigation Planning Coordination

Local Mitigation Planning Coordination

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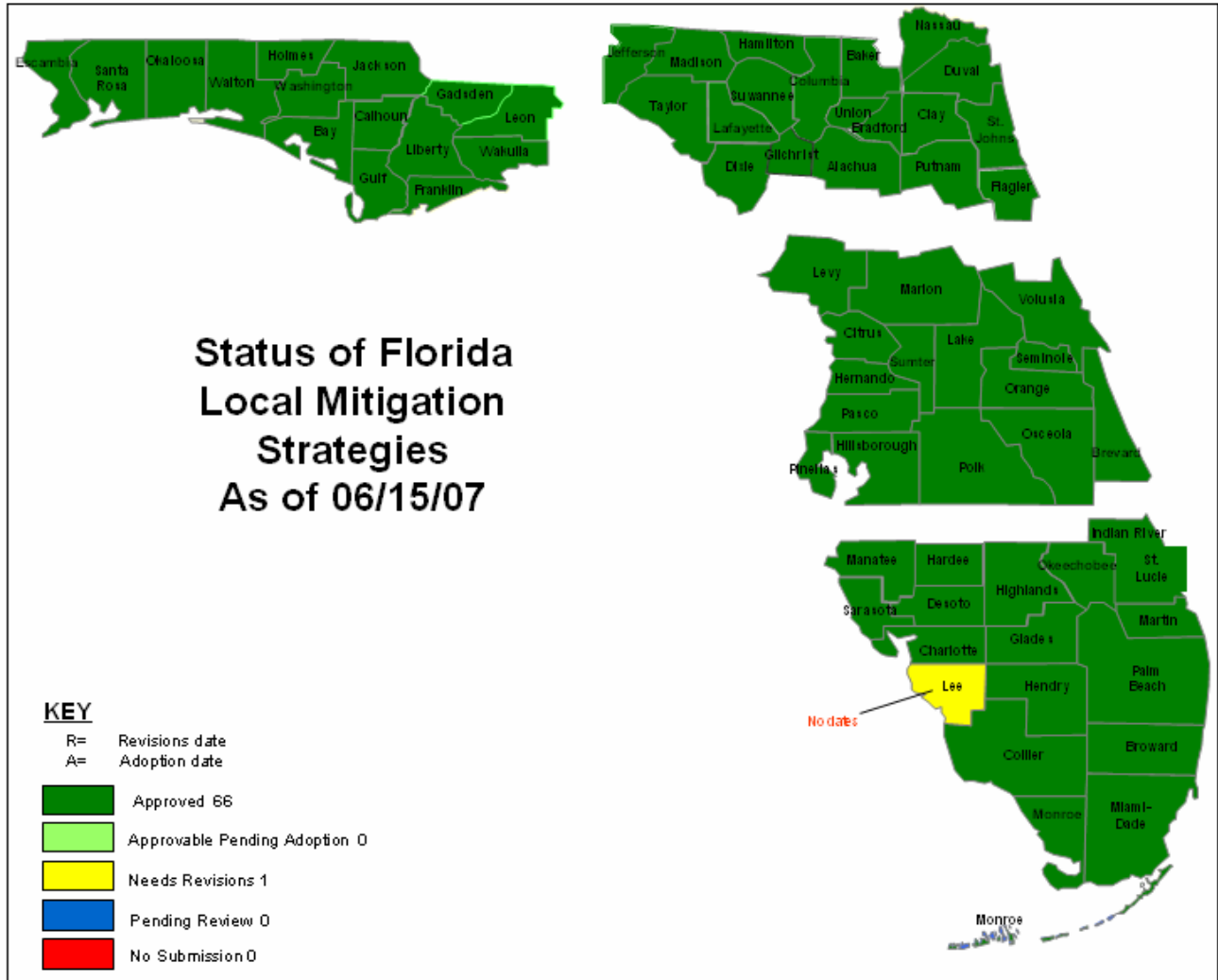
5.1 Local Funding and Technical Assistance

44 CFR 201.4(c)(4)(i) - The section should include a description of the state process to support, through funding and technical assistance, the development of local mitigation plans.

After Hurricane Opal in 1996, which caused massive coastal erosion, and the El Niño flooding events in 1997-98, the state of Florida realized that hazard mitigation measures could be more effectively moved into the implementation stage if local governments using a broad spectrum of community representation were empowered to set their own mitigation priorities and projects. In 1997, the state of Florida launched a \$14,229,361 project to promote Local Mitigation Strategies (LMS). FEMA provided \$5,285,704 in Hazard Mitigation Grant Program (HMGP) funds allocated under seven previous disaster declarations. The State of Florida contributed the other \$8,943,656. The project provided funding for each county and its incorporated municipalities to work together to prepare a multi-jurisdictional unified LMS that serves as a bridge between the local government comprehensive and emergency management plans, land development regulations, building codes, other ordinances and local capital improvement programs. The focus of the LMS is broad-based, pre-disaster mitigation planning, providing an effective analytical method of integrating hazard mitigation concepts into policy and routine decision-making.

The mitigation strategies rely on working groups that bring together a broad range of government officials (building codes, planning and zoning, public works, emergency management, engineering, housing, transportation authorities) and officials from such entities as utilities, school boards, water management districts, area businesses, insurance providers, land developers, and non-profit organizations. To assist these working groups, the department provides technical assistance in the form of training, workshops and materials.

As of June 2007, 66 of 67 counties within Florida had completed their LMS plans. The hazard identification and vulnerability assessments and risk analyses provide dollar estimates of potential property losses throughout the state. Building directly upon these assessments, each county has identified a prioritized list of hazard mitigation measures, with an accompanying action plan for their implementation. The LMS's have thus become the foundation of the statewide pre-disaster mitigation planning activities. Below is a map showing the compliance within the state of Florida. All but one county has successfully completed their LMS.



Map of Florida showing status of LMS plans (66 of 67 completed and approved)

Below are the specific counties with approved LMS plans, including their date of formal approval and funding sources as of June 2007.

County	Date of Formal Approval	Funding Source
Alachua	APPROVED 08/30/04	FY02 PDM
Baker	APPROVED 12/01/04	FY03 PDM
Bay	APPROVED 02/01/05	FY02 PDM
Bradford	APPROVED 05/02/05	HMGP 1345
Brevard	APPROVED 10/19/04	HMGP 1345
Broward	APPROVED 12/30/04	Not applying
Calhoun	APPROVED 11/30/04	HMGP 1345
Charlotte	APPROVED 04/29/05	HMGP 1345
Citrus	APPROVED 05/04/05	HMGP 1345
Clay	APPROVED 01/22/05	FY03 PDM

Collier	APPROVED 01/07/05	HMGP 1345
Columbia	APPROVED 04/22/05	HMGP 1345
DeSoto	APPROVED 11/09/04	Contract pending
Dixie	APPROVED 02/08/06	FY02 PDM
Duval	APPROVED 03/11/05	FY03 PDM
Escambia	APPROVED 12/07/04	HMGP 1345
Flagler	APPROVED 12/01/04	FY03 PDM
Franklin	APPROVED 04/07/05	FY02 PDM
Gadsden	APPROVED 05/15/07	HMGP 1345
Gilchrist	APPROVED 07/25/06	HMGP 1345
Glades	APPROVED 07/01/05	HMGP 1345
Gulf	APPROVED 03/18/05	HMGP 1345
Hamilton	APPROVED 05/02/05	HMGP 1345
Hardee	APPROVED 05/04/05	No contract
Hendry	APPROVED 05/18/05	HMGP 1345
Hernando	APPROVED 01/08/05	FY03 PDM
Highlands	APPROVED 04/22/05	HMGP 1345
Hillsborough	APPROVED 11/12/04	HMGP 1345
Holmes	APPROVED 10/13/06	FY03 PDM
Indian River	APPROVED 02/25/05	HMGP 1345
Jackson	APPROVED 04/22/05	HMGP 1345
Jefferson	APPROVED 03/24/05	HMGP 1345
Lafayette	APPROVED 04/27/05	HMGP 1345
Lake	APPROVED 03/22/05	HMGP 1345
Leon	APPROVED 01/20/05	FY02 PDM
Levy	APPROVED 04/27/05	HMGP 1345
Liberty	APPROVED 10/12/06	HMGP 1345
Madison	APPROVED 04/20/05	HMGP 1345
Manatee	APPROVED 11/09/04	HMGP 1345
Marion	APPROVED 04/27/05	HMGP 1345
Martin	APPROVED 04/14/05	FY02 PDM
Miami-Dade	APPROVED 10/19/04	Not applying
Monroe	APPROVED 11/14/05	HMGP 1345
Nassau	APPROVED 01/10/05	FY03 PDM
Okaloosa	APPROVED 07/18/06	HMGP 1345
Okeechobee	APPROVED 06/13/05	HMGP 1345
Orange	APPROVED 06/04/04	FY02 PDM
Osceola	APPROVED 06/09/05	HMGP 1345
Palm Beach	APPROVED 11/26/04	HMGP 1345
Pasco	APPROVED 08/30/04	HMGP 1345
Pinellas	APPROVED 11/12/04	HMGP 1345
Polk	APPROVED 06/08/05	HMGP 1345
Putnam	APPROVED 01/07/05	FY03 PDM
Santa Rosa	APPROVED 05/04/05	HMGP 1345
St. Lucie	APPROVED 03/08/05	HMGP 1345
St. Johns	APPROVED 05/31/05	FY03 PDM
Sarasota	APPROVED 11/20/04	HMGP 1345
Seminole	APPROVED 01/18/05	HMGP 1345

Sumter	APPROVED 04/27/05	HMGP 1345
Suwannee	APPROVED 04/22/05	HMGP 1345
Taylor	APPROVED 04/20/05	HMGP 1345
Union	APPROVED 03/02/05	HMGP 1345
Volusia	APPROVED 02/28/05	FY03 PDM
Wakulla	APPROVED 10/12/06	HMGP 1345
Walton	APPROVED 05/02/05	HMGP 1345
Washington	APPROVED 01/30/06	FY03 PDM

Integration of Hazard Mitigation Planning into Local Government Comprehensive Plans

As discussed in the opening of Section 5.1, the Department of Community Affairs created the initiative known as the Local Mitigation Strategy (L.M.S.) in 1998 and funded local governments that chose to develop strategies to mitigate hazards. Two years later, Congress enacted the Disaster Mitigation Act (that amended the Stafford Act), which mandates that all local governments in the United States prepare local mitigation strategies to reduce vulnerability and risk associated with future growth and development. These strategies must be approved by both F.E.M.A. and the State of Florida.

In order to provide incentives for local governments to integrate hazard mitigation principles from their Local Mitigation Strategies into the local comprehensive plan, the department is providing assistance in evaluating the risks and vulnerabilities facing communities and facilitating discussions between local government planning officials and emergency management planners regarding mitigation priorities. The intent is to focus on the use of comprehensive planning and land use strategies to reduce future damage to property and public facilities, avoid development in hazardous areas and provide for adequate public shelters and reduced hurricane clearance times.

DCA is working with planning and emergency management officials to understand how Florida's communities are implementing hazard mitigation principles, and whether these principles in each Local Mitigation Strategy, Comprehensive Emergency Management Plan, Post-Disaster Redevelopment Plan, and Long-Term Recovery Plan have been incorporated into the comprehensive plan. Evaluation and Appraisal Reports (EAR) have been prepared to help with this task, pursuant to existing legislative requirements and best practices. Below are the past and present schedules of EAR meetings with local planners from 2004-2008:

Evaluation and Appraisal Reports Workshop Schedule

Date/Time	Meeting Location/Host/Contact	Target Counties
11/10/04	East Central Florida Regional Planning Council	Orange, Brevard, Seminole, Volusia
5/18/05	West Florida Regional Planning Council	Walton, Bay, Okaloosa, Escambia, Santa Rosa, Franklin, Gulf
8/22/05	Northeast Florida Regional Planning Council	Clay, St. Johns, Duval, Nassau, Baker
3/01/06	Apalachee Regional Planning Council	Leon, Wakulla, Jefferson, Taylor, Dixie
10/10/06	Central Florida Regional Planning Council	Highlands, Hendry, Polk, DeSoto, Glades, Hardee, Osceola, Lake, Okeechobee
2/23/07	Apalachee Regional Planning Council and West Florida Regional Planning Council	Washington, Holmes, Jackson, Liberty, Gadsden, Calhoun
8/07	Treasure Coast Regional Planning Council	Martin, St. Lucie, Indian River
6/08	North Central Florida Regional Planning Council	Lafayette, Flagler, Suwannee, Alachua, Gilchrist, Madison, Union, Putnam, Bradford, Marion, Sumter

EAR Workshops Scheduled from 2004-2008

The following guides and best practices manuals have been developed and are available for local planners through DCA:

[Disaster Planning for Florida's Historic Resources](#), May 2006. The guide includes steps to improve coordination between emergency management and historic preservation efforts within a community in order to reduce disaster-related damage and rebuild local economies (108 pages).

[Protecting Florida's Communities: Land Use Planning Strategies and Best Development Practices for Minimizing Vulnerability to Flooding and Coastal Storms](#), DRAFT, May 15, 2006. The guide provides information on planning policies and strategies that can be implemented before and after disaster events to further reduce community vulnerability to coastal storms and related flooding (208 pages).

[*Wildfire Mitigation in Florida: Land Use Planning Strategies and Best Development Practices](#), April 2004. The guide examines the role of planning in community wildfire mitigation efforts and includes planning strategies and information about the regulatory framework (147 pages).

[*Protecting Florida's Springs: Land Use Planning Strategies and Best Management Practices](#), December 2002 (124 pages).

These guides and other best practices guides may be viewed in detail at:
<http://www.dca.state.fl.us/fdcp/dcp/publications/index.cfm>

Hazard summaries and profiles for each county and case studies for 17 municipalities are available online that identify the predominant hazards in these communities, the hazard mitigation principles that are in place, and recommend additional hazard mitigation principles that could be incorporated into the comprehensive plans to reduce hazard vulnerability and risk. These profiles also contain suggestions on how the

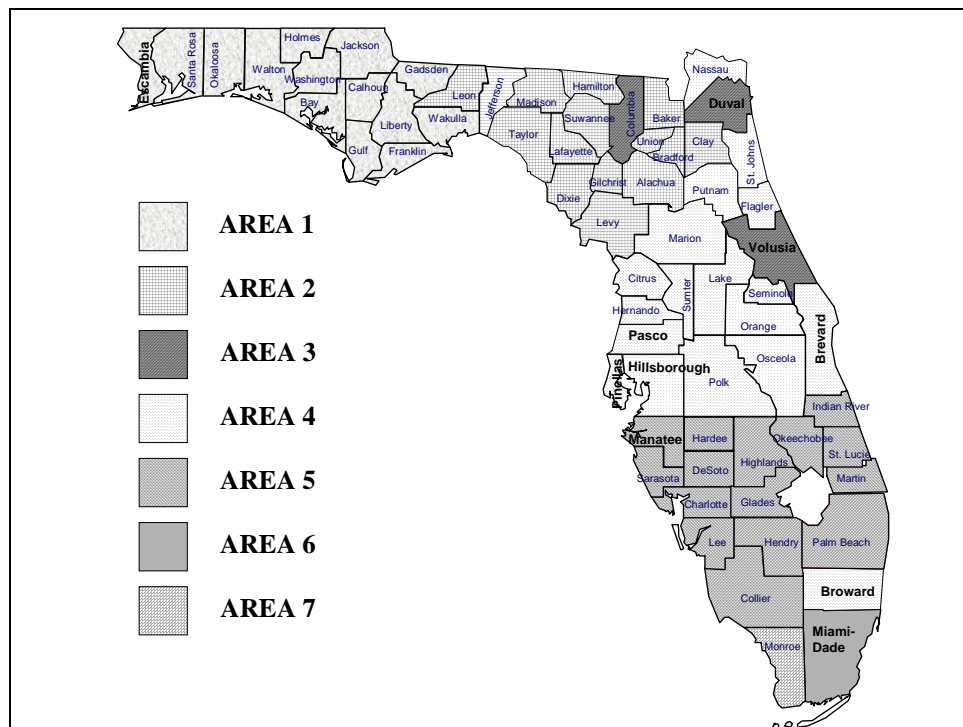
current local mitigation strategies could be enhanced to support long-range planning efforts through additional data or information.

As part of their technical assistance effort, a series of Hazard Mitigation workshops have been conducted to gather input from local planning officials and emergency managers for the profiles.

The workshops included an overview of the draft county profiles and a facilitated discussion to obtain recommendations for implementing hazard mitigation strategies into the comprehensive plan. The recommendations were reflected in the final county profile, copies of which have been provided to the county. The local governments may use this analysis for their recommended E.A.R. amendments.

LMS Liaisons

In order to provide technical assistance to local planners, as well as to ensure effective understanding of local conditions and characteristics important to successful implementation of mitigation and redevelopment measures by communities, individual LMS liaisons from the division have been assigned to serve as principal contacts for local government representatives, municipalities, and members of the private sector regarding hazard mitigation planning and programming. The areas of the state that have been assigned contacts are illustrated below.



7 Areas of LMS Liaisons across the State of Florida

The responsibilities of each LMS liaison are to support mitigation strategy maintenance and improvement by local governments, to understand conditions relevant to mitigation and redevelopment planning for these communities, to represent the interests of the communities to the division in program development and implementation, and to provide technical assistance to the LMS Working Groups on updating and implementing the LMS.

Local Hazard Mitigation Coordinators

The division encourages and expects county government to designate an individual to serve as a Hazard Mitigation Coordinator. The division anticipates that this individual will serve as the coordinator and contact point for local and divisional communications regarding the following:

- The planning process for maintaining the local hazard mitigation strategy,
- Community compliance with the National Flood Insurance Program, the Community Rating System, and the local Flood Mitigation Assistance Plan,
- The relevant elements of the jurisdiction's required comprehensive plan, its amendments, and the Evaluation and Appraisal Report required under F.S. Chapter 163,
- The relevant elements of the county's comprehensive emergency management plan required under F.S. Chapter 252,
- Local government actions and responsibilities for processing of applications for mitigation measures under funding programs represented by the department, such as those available under the Pre-Disaster and Hazard Mitigation Grant Program of the Division of Emergency Management and the Community Development Block Grant program of the Division of Housing and Community Development,
- Departmental programs for technical assistance and training,
- Input from the jurisdiction to the department's development and maintenance of the Florida Hazard Mitigation Strategy, and
- Other relevant activities and programs as they arise.

LMS Working Groups

Each county electing to participate in the HMGP must have a formal LMS Working Group and a current LMS. Not later than the last working weekday of January of each year the Chairperson of the Board of County Commissioners shall submit to the department a list of the members of the Working Group and its designated chairperson and vice-chairperson. The Working Group is required to have representation from various agencies of county and municipal government, interested private organizations, civic organizations, trade and commercial support groups, property owners associations, Native American tribes or authorized tribal organizations, water management districts, regional planning councils, independent special districts and non-profit organizations.

Counties must demonstrate that they have issued a written invitation to each municipality, private organization, civic organization, Native American tribe or authorized tribal organization, water management district, independent special district and non-profit organization, as applicable, to participate in the LMS working groups. This documentation shall accompany the membership list submitted to the department. The Working Groups are responsible for designating a chairperson and vice-chairperson, revising the LMS as necessary, coordinating all mitigation activities within the county, setting the an order of priority for local mitigation projects, and submitting annual LMS updates to the department.

The division's staff has been actively providing technical assistance to local governments on revising existing LMS documents to meet the requirement of the Disaster Mitigation Act of 2000 (DMA2K). As of June 2007, staff have met regularly with assigned LMS chairpersons, attended LMS working group meetings, and made formal presentations on the minimum planning requirements for local mitigation plans as detailed in the DMA2K.

In addition, the division staff held five regional workshops during August and September 2002 to review the criteria and the FEMA provided supplementary materials. These were well attended but suffered from a lack of examples drawn from actual reviews. In January 2003, the division staff completed a joint training session with its FEMA counterparts and jointly reviewed ten LMSs that had been locally revised to meet the new criteria. From this review, staff drew examples for each of the criteria with a critique of what was right, what was missing and exactly what is necessary to meet the criteria. These examples became the basis for four additional regional training workshops held during the second week of March 2003.

The division has also purchased a copy of the 2003 version Mitigation 20/20™ for each county working group and sponsored five regional training sessions on its use given by the developer. These were very well attended and there appears to be considerable interest in using the program at least for part of the analysis.

The division was awarded \$3 Million in HMGP 7 percent planning funds by FEMA to provide a range of local assistance that includes:

- Planning Grants - The application contains \$1.7 million for local planning assistance to make the necessary revisions to meet the DMA2K requirements. A portion of the funds will be used for small grants to some of the smaller counties that normally use consultants to develop their local plans and need such assistance to bring their LMS into compliance. The balance of the funds will be available on a competitive basis for larger studies to improve the quality of compliant LMSs and meet the criteria described in the Funding Sources section of this plan.

- Hazards Analysis Data - In the application, the division has set aside funds to purchase a second round of The Arbiter of Storms (TAOS) for each county Working Group. TAOS identifies areas within each county with high potential for damage from high winds, storm surge and inland flooding along with estimates of damage. Each county working group will receive a CD with maps of the hazard areas that they can printout and use in revising their vulnerability and risk analysis as well as the data layers that working groups with access to GIS capability can use to carry out more refined studies.
- Identifying Future Risk - Under a previous grant, the division is providing partial funding for a GIS based land-use predictive model developed by Prescott College, Prescott Arizona in cooperation with NASA. The model takes land-use decisions and projects the outcome in terms of development over a twenty-year period and presents the results in a GIS format. With our assistance, the model will also project any increases in risk from natural disasters associated with a particular land-use decision. The current application contains funds to expand the number of test counties and becomes a tool to consider future risk as required in DMA2K.
- Comprehensive Plan/LMS Nexus - Finally, the application provides over \$500K for one or more consultants that will, on a county-by-county basis beginning with the coastal counties, review all local comprehensive plans to determine where additional mitigation is necessary or desirable. Once this is complete, the consultant will review the LMS to determine its capability to provide the needed mitigation data to the associated comprehensive plans. Finally, the consultant will conduct a mediated session between the planners and the LMS Working Group to discuss ways to better integrate the LMS and the local planning process.

Additionally, the division has developed and provides a number of planning related tools to assist local governments in developing comprehensive mitigation programs. This local mitigation toolkit includes:

Resource Identification Strategy

The Department of Community Affairs in partnership with the Florida Public Affairs Center at Florida State University assists communities and other potential applicants in finding funds needed for disaster mitigation and recovery related activities. These organizations developed the web based Resource Identification Strategy (RIS) - a comprehensive, continually updated database that contains information on historical and potential funding sources for disaster preparedness, response, mitigation, recovery, and long-term redevelopment related projects.

Handbook for Hazard Mitigation Projects

This handbook addresses mitigation projects that protect existing public buildings and critical facilities, including flood proofing and wind retrofits of existing public utility infrastructure. Projects may also be to mitigate future damage at facilities owned by eligible private non-profit organizations, and Indian tribes or authorized tribal organizations. The handbook is organized to follow the typical process, from planning a project, considering the factors that affect both design and implementation, preparing the application, implementing the project, through to a section on closing the books.

Handbook for Floodplain Acquisition and Elevation Projects

Most of this handbook is written to address floodplain acquisition, although a section on elevation is included. In addition, the primary focus is on residential properties. Like the *Handbook for Hazard Mitigation Projects* above, it is organized to follow the typical process from planning to closeout.

The Local Mitigation Strategy: A Guidebook for Florida Cities and Counties

This guidebook was prepared to help communities and counties develop hazard mitigation strategies in order to:

1. Identify problems and possible mitigation solutions in advance of a disaster to be in a better position to obtain post-disaster funding.
2. Recover faster, reduce vulnerability and identify opportunities for post-disaster mitigation.
3. Meet comprehensive planning and other planning requirements and achieve community goals.

The guidebook helps a community prepare a local mitigation strategy by providing an outline and information about technical assistance. It is recommended that local governments use this guidebook as an index to record where criteria items are addressed in existing plans, ordinances or policies.

Floodplain Management Home Study Course for Florida Officials

The course is designed to meet two goals. The first is to share and discuss the importance of floodplain management to a number of mitigation planning and project measures. The second is to assist local officials in properly administering and enforcing construction and development activities in Special Flood Hazard areas. The course materials clarify the minimum federal regulations contained in *Title 44 Code of Federal Regulations* and *The Model Flood Damage Prevention Ordinance*.

Florida Firewise Communities Program

This program is an interagency planning and mitigation program led by the Division of Forestry to address the growing problem of wildfire in the wildland/urban interface. The objectives of the Florida Firewise Communities Program are to educate citizens and community leaders on the threat of interface fire and the need for Florida citizens at all levels to accept a certain level of responsibility as partners with the fire service community in mitigation and fire prevention. Firewise Communities workshops are held in local counties and municipalities so participants can see how to apply wildfire mitigation practices to their own communities. A Florida Firewise Communities Steering Committee coordinates statewide implementation of the program.

STORM

STORM (Simulation Training on Recovery and Mitigation) is a gaming simulation of the post-storm recovery process. It is a training device for state and local officials who may have to deal with hurricane recovery but who lack prior experience. The game does this by confronting players with the major decisions that local governments must make during hurricane recovery and by demonstrating to players the value of pre- and post-storm recovery planning for the issues created by coastal storms.

The MEMPHIS System

MEMPHIS (Mapping for Emergency Management, Parallel Hazard Information System) is a web based hazard analysis system that was commissioned as part of the local LMS plan development strategies in 2003. The MEMPHIS system allows emergency managers to easily access a variety of hazard related data and run hazard queries based on the area of their local jurisdictions. Data documentation and creation included within the system include hazard maps, local estimated loss amounts, and areas of hazard vulnerability.

The MEMPHIS System, which was commissioned and paid for by grant funding arranged by the Division of Emergency Management, serves as an example of funding and technical assistance the state has provided to assist local jurisdictions in completing approvable mitigation plans. To further assist the ongoing local planning initiative, the state of Florida has made arrangements for updates to be made to the MEMPHIS System in 2006/2007 to support the revision of LMS plans in the coming years. The project will include the following upgrades:

Phase 1: The existing (2004) database will be re-structured to provide map and tabular results for each of the 11 Florida regional planning districts. This restructuring includes:

- Addition of interactive query and mapping on the MEMPHIS site at the regional planning council level of aggregation.
- Generation for each of the regional planning council's areas of the same PDF maps and reports that were produced at the county level under the original project.

- Presentation of storm surge hazards and impacts separately from other flood-related impacts.

Phase 2: A new hazard impact assessment will be carried out using updated data on hazards through the end of 2006, and the latest available LIDAR data. SLOSH and HAZUS outputs will be added to the analysis as part of this update. The State of Florida will provide the current LIDAR, exposure and related data for use in this analysis. The MEMPHIS site will be updated with the results of this assessment and maps and reports for use in mitigation planning will be produced at the municipal (including unincorporated areas), county, regional planning council and statewide levels.

5.2 Local Plan Integration

44 CFR 201.4(c)(4)(ii) - The section should include a description of the state process and timeframe by which the local plans will be reviewed, coordinated, and linked to the State Mitigation Plan.

This section describes the division's process and timeline for reviewing and linking Local Mitigation Strategies to the State Mitigation Plan. As part of the 2007 update, the SHMPAT reviewed the state's existing processes and timelines for reviewing and linking Local Mitigation Strategies to the State Mitigation Plan and have found that the current methods contained herein are accurate and meet the current requirements. Effective June of 2007, all but one county within Florida has a completed multi-jurisdictional Local Mitigation Strategies (LMS).

Initially, the Mitigation Section reviewed each of the 67 LMS to determine if the goals and objectives and risks assessment of the local plans are consistent with those of the state plan. As of April 30, 2004, 30 LMS counties had submitted draft copies of their goals and objectives and risk assessment. State Mitigation staff reviewed the newly submitted documentation to assure that revision to the Local Mitigation Strategies are consistent with the State Mitigation Plan. It is anticipated that by January 2005, 25 additional communities will submit their revised LMS to the state for review. As these plans are reviewed and submitted to FEMA for final approval, state Mitigation staff will integrate the appropriate local plan data into the State Mitigation Plan. On an annual basis, the SHMPAT will revise the State Mitigation Plan to incorporate new and better data on local risk assessment as needed. The state will continue to work with the remaining 12 communities that have projected that their plans will be revised to meet DMA2K by November 2005.

Local Plan Review and Approval Process

The Mitigation staff in partnership with FEMA, reviews the final LMS and subsequent revisions thereto as they are submitted. The reviews will document the degree to which the local plan is consistent with the State Mitigation Plan and compliance with the minimum local mitigation planning requirements of the Disaster Mitigation Act of 2000. The following is an overview of the LMS review and approval process:

1. The LMS working group will submit the final draft of the local plan or proposed revisions to the local plan to the State Mitigation Staff for review for compliance with the minimum local mitigation planning requirements of the Disaster Mitigation Act of 2000.
2. The mitigation staff will review the local plan within 45 days of receipt and if the plan is deemed compliant by state Mitigation staff, it will be forwarded to FEMA for final review and approval. If not compliant, the plan will be returned to the community with a list of deficiencies. The local LMS Working Group will make

changes as needed and resubmit local plans to the state for additional review and final approval.

3. Upon FEMA's final review and approval, the division will formally notify the respective county of plan approval.

Once compliant with Disaster Mitigation Act of 2000, the division will monitor local plan implementation in four ways:

1. First, monitoring and technical assistance will be provided on local plan implementation through monthly contacts made by the assigned state mitigation staff liaison as discussed in Section 5.1;
2. Second, through the annual reporting requirements set out in the Departmental Rule 9G-22 of the Florida Administrative Code;
3. Third, through the periodic FEMA/state review required every five years in Disaster Mitigation Act of 2000; and
4. Fourth, after any major Presidential declared disaster event, the state Mitigation staff will contact the chairman of the impacted counties LMS Working Group and request that the group be convened to review the impacts of the event in the community. This group will team with the SHMPAT and function as the Interagency Hazard Mitigation Team.

Currently, the Local Comprehensive Emergency Management Plan (CEMP) is reviewed by the state every four years. Once an LMS is found compliant, we will suggest to the working group to move that LMS to a four-year schedule that alternates every two years with the CEMP review. Thus, two years after a CEMP review, the county will have an LMS review. Any changes affecting the state plan not previously picked up through informal contact of the annual update will be incorporated at that time.

2007 - Local LMS Plan Review and Approval Process

The state of Florida and members of the SHMPAT have assessed the processes by which the state reviews and manages the development of local LMS plans. The SHMPAT found that over the past three years since the initial phases of local LMS plan development and submission, the process by which the state reviews these plans is successful and efficient. As a result of this efficiency, 66 of the 67 counties within the state of Florida currently possess FEMA approved local LMS plans.

Going forward to further increase efficiency for all parties involved and to create an on-line database, the state will implement the use of FloridaPAPERS for the LMS review process. FloridaPAPERS – Process Automation & Paperless Electronic Routing System, is an Internet-based business application that relies on the use of Adobe

Acrobat PDF documents and allows for the use of Entrust electronic signatures, which has the same authority as an original signature. This system is open for use by FEMA, state, local and tribal governments. This system will be used starting with the five-year LMS update.

To that note, the State of Florida and members of the SHMPAT have concluded that other than implementing FloridaPAPERS, there will not be any major modifications to their approach in the local LMS plan review process; however, the state does understand that there are two major constraints that must be resolved going forward.

- **Constraint #1 - During 2007, there was a tremendous amount of turnover within the Mitigation Division resulting in an estimated 80% of change over in Mitigation Division management positions. These changes will result in the need for the state to find qualified replacement personnel and provide these personnel with skilled training to continue the previously successful process of local LMS plan reviews.**

- **Constraint #2 - The State of Florida had tremendous success with the initial development of local LMS plans in 2004, 2005, and 2006. With that success, the SHMPAT and the State of Florida found that to meet the revision requirements, many of future LMS revisions and submissions of updates may run consecutively, thereby putting a strain on the state's ability to review and grade plans efficiently. In 2004, there were 16 plans approved, which resulted in their update and review in 2009. In 2005, there were 41 plans approved, which will result in their update and review in 2010. The challenge that the state faces is the ability to effectively review, grade, and provide feedback in a timely manner should a large number of plans be submitted within a constrained timeframe. The implementation of FloridaPAPERS is the first step the state is taking to help overcome this challenge. FloridaPAPERS will provide one location to store all LMS documents eliminating the possibility of misplaced documents or the created lag time of transferring plans between the state and FEMA. It will also provide a historical record of the review process so all parties involved will have the ability to monitor the process.**

The Mitigation staff in partnership with FEMA will review LMS and subsequent revisions thereto as they are submitted. The reviews will document the degree to which the local plan is consistent with the State Mitigation Plan and compliance with the minimum local mitigation planning requirements of the Disaster Mitigation Act of 2000 and the local mitigation planning requirements outlined in CFR Part 201.6. The following is an overview of the LMS review and approval process:

1. The LMS working group will convene to review their current LMS document and identify the areas required for update as appropriate. Upon review and update, the LMS working group will submit, via FloridaPAPERS, the updated final draft of their local plan to the Mitigation Planning Unit within the Florida Division of Emergency Management for review for compliance with the minimum local

mitigation planning requirements. Required with the submission, the LMS working group should provide an updated crosswalk with corresponding pages identifying where each requirement has been met.

2. A state planner within the Mitigation Planning Unit will review the local plan within 45 days of receipt and if the plan is deemed compliant by the State Mitigation staff, it will be forwarded to FEMA via FloridaPAPERS for final review and approval. If the submitted LMS plan is found to be not compliant, the plan will be returned to the community with a list of deficiencies and areas to focus upon for completion. The local LMS Working Group will make changes as required and re-submit their LMS to the Mitigation Planning Unit for additional review and final approval. This state review process will continue until all requirements within the LMS have been accomplished to satisfaction.
3. Upon FEMA's final review and approval, the Mitigation Planning Unit will formally notify the respective jurisdiction of LMS plan approval. If the submitted LMS plan is found by FEMA to be not compliant, FEMA will return the plan through the state, to the community with a list of deficiencies and areas to focus upon for completion.
4. As required by CFR 201.6(5) all jurisdictions within the county must provide documentation that the plan has been formally adopted by the governing body of all jurisdictions within the county. This step should be performed once FEMA has formally approved the LMS plan.
5. Upon formal approval by FEMA, the approved LMS plan will be announced and discussed at the next SHMPAT meeting. From those discussions and findings, the SHMPAT will be tasked with implementing data from the local plan into the state mitigation plan.

Once compliant with local mitigation planning requirements, the Mitigation Planning Unit will monitor local plan implementation in four ways:

1. First, monitoring and technical assistance will be provided on local plan implementation through monthly contacts made by the assigned state mitigation staff liaison as discussed in Section 5.1;
2. Second, through the annual reporting requirements set out in the Departmental Rule 9G-22 of the Florida Administrative Code;
3. Third, through the periodic FEMA/state review required every five years in Disaster Mitigation Act of 2000; and
4. Fourth, after any major presidential declared disaster event, the state Mitigation staff will contact the chairman of the impacted counties LMS Working Group and request that the group be convened to review the impacts of the event in the

community. This group will team with the SHMPAT and function as the Interagency Hazard Mitigation Team.

As discussed, there are currently 66 LMS plans developed and formally approved within the State of Florida. During the 2007 update process to the state hazard mitigation plan, each of the 66 approved local LMS plans were reviewed individually, and specific areas of local plan data were targeted for immediate implementation into the 2007 state plan. The areas of focus within each local LMS are:

- Historical Hazard Events
- Local Estimated Losses
- Local Prioritization of Hazards
- Local Mitigation Projects and Initiatives

As part of the requirement for the ongoing development and revision of local LMS plans every five years, it will be necessary that revisions are made and submitted for approval. As these plans are reviewed and submitted to FEMA for final approval, state Mitigation staff will continue to integrate the appropriate local plan data into the State Mitigation Plan. On an annual basis, the SHMPAT will revise the State Mitigation Plan to incorporate new and better data on local risk assessment as needed.

5.3 Prioritizing Local Assistance

44 CFR 201.4 (c)(4)(iii) - The section shall include criteria for prioritizing communities and local jurisdictions that would receive planning and project grants under available funding programs which should include consideration for communities with the highest risks, repetitive loss properties, and most intense development pressures. For non-planning grants, a principal criterion for prioritizing grants shall be the extent to which benefits are maximized according to a cost benefit review of proposed projects and their associated costs.

This section provides a brief description of the criteria by which the state will prioritize communities and local jurisdictions for available mitigation planning and project funding under available programs. As part of the 2007 update, the SHMPAT reviewed the state's existing methods of prioritizing communities and local jurisdictions for available mitigation planning and project funding under available programs and have found that the current methods contained herein are accurate and meet the current requirements.

The state's Mitigation Strategy prioritizes communities and local jurisdictions based upon communities with the highest risks, repetitive loss properties, most intense development pressures, but most importantly their demonstrated commitment toward mitigation. The state's Local Mitigation Strategy Initiative was developed on the premise that communities that adopt and implement pre-disaster mitigation strategies should be given priority over those communities that do not, when various mitigation funding opportunities are made available. Additionally, the state does not rank or prioritize planning and project applications from local communities. The Department's Rule 9G-22 requires Local Mitigation Strategy Working Groups to prioritize and rank locally submitted projects. The local prioritization process will vary from community to community, however, at a minimum the process must include criteria that includes cost effectiveness, technical feasibility and environmental soundness for each project. For a detailed review of the process used by a particular Local Mitigation Strategy Working Group to prioritize projects or applications, please review that local community Mitigation Strategy.

Several state administered grant programs have recognized the importance of pre-disaster mitigation planning and have begun providing additional points if the project is listed in the respective Local Mitigation Strategy. Examples of such programs are the Small Cities Community Development Block Grant Program and the Florida Community Trust Program, which are administered by the Department of Community Affairs. The Coastal Zone Management Program, which is administered by the Florida Department of Environmental Protection, also awards additional points to project applications that are listed in the respective Local Mitigation Strategies.

The SHMPAT will continue to explore opportunities to encourage other state agencies and mitigation related funding sources to consider adopting policies requiring all

mitigation related projects submitted for funding to be included in the respective Local Mitigation Strategy or the State Mitigation Plan Initiative list.

Non –Federally Funded Planning and Project Grants

The strategy outlines the criteria by which the department will prioritize communities that receive planning and project grants under state and other non- federally funding sources. A community must be a participant in the Nation Flood Insurance Program. Funding will vary by agency and the eligibility requirements will vary by funding source; the state plan recommends that all available non-Federal funds be distributed to those communities that have clearly demonstrated both the ability and the desire to complete the plan and to follow through with the measures developed in the plan.

1. Communities that have demonstrated a high level of local commitment to hazard mitigation planning:

- a) The Department has approved the LMS and it exceeds minimum planning criteria;
- b) Identified and prioritized key local measures that will enhance the LMS;
- c) LMS Working Group meets at least once a quarter; and
- d) The community's ability to provide the non-federal match.

2. Communities that have demonstrated some level of local commitment to hazard mitigation planning:

- a) The department has approved the LMS and it meets minimum planning criteria;
- b) LMS Working Group meets at least annually; and
- c) The community's ability to provide the non-federal match.

3. Communities that have not demonstrated any level of local commitment to hazard mitigation planning:

- a) The department has not approved the LMS; and
- b) LMS Working Groups do not meet

Federally Funded Planning Related Grants

The strategy outlines the criteria by which the department will prioritize communities that receive planning and project grants under federal funding sources. Listed below are the criteria by which the department will prioritize communities that receive funding under

the federal grant program that includes the Flood Mitigation Assistance (FMA), Hazard Mitigation Grant Program (HMGP) and Pre-Disaster Mitigation (PDM) programs. Since funding for mitigation planning activities is limited, available funds must be distributed to those communities that have clearly demonstrated both the ability and the desire to complete the local plan and to follow through with the measures developed in the plan.

All requests for flood loss reduction planning related activities shall be referred to the National Flood Insurance and Flood Mitigation Assistance Programs Section for FMA Planning Grant funding consideration. Included in the consideration will be an overall review of the communities risk and the total of the community's repetitive loss properties. If funds are not available or the proposed planning project is not eligible for funding under FMA, the planning project will be provided to the Mitigation Planning Section for further consideration.

Flood Mitigation Planning Grants

To be eligible for FMA Planning Grant funds, a community must be a compliant participant, which is not on probation or suspended, in the National Flood Insurance Program (NFIP). The department awards FMA Planning Grants at its professional discretion to eligible communities that best meet the objectives of benefiting the National Flood Insurance Program fund. Additionally, the following criteria will be considered in determining which communities receive FMA Planning Grants:

1. NFIP local governments that have repetitive loss structures but have never submitted or infrequently submitted applications to the FMA for repetitive loss projects;
2. NFIP local governments that participate in the Community Rating System program with ten or more repetitive loss properties listed on FEMA's Repetitive Loss List;
3. NFIP local governments that have a high total number of repetitive or targeted repetitive loss structures on FEMA's repetitive loss list; and
4. NFIP local governments that have experienced a significant flood event but for which they did not receive a Presidential Disaster Declaration; and
5. NFIP local governments that have targeted repetitive loss structures.

Hazard Mitigation Grant Program 7% and Pre-Disaster Mitigation Planning Grants

To be eligible for HMGP 7% and PDM Planning Grant funds, a community must be an active participant in the NFIP. Additionally, the following criteria will be used to prioritize communities for HMGP 7% and PDM Planning Grant assistance:

1. Communities that have demonstrated a high level of local commitment to hazard mitigation planning:
 - a) The department has approved the LMSs and it exceeds minimum planning criteria;
 - b) Identified and prioritized key local planning measures that will enhance the LMS;
 - c) LMS Working Group meets at least once a year; and
 - d) The community's ability to provide the non-federal match.
2. Communities that have demonstrated some level of local commitment to hazard mitigation planning:
 - a) The department has approved the LMSs and it meets minimum planning criteria;
 - b) LMS Working Group meets at least once a year; and
 - c) The community's ability to provide the non-federal match.
3. Communities that have not demonstrated any level of commitment to hazard mitigation planning:
 - a) The department has not approved the LMSs; and
 - b) LMS Working Group does not meet.

Federally Funded Project Related Grants

The Disaster Mitigation Act of 2000 provides that as a condition for receipt of future federal mitigation assistance funds, a local government must have a FEMA approved local mitigation plan. Additionally, for all FMA, HMGP and PDM funded projects, the state will recommend to FEMA for funding locally prioritized projects that are technically feasible, cost effective and environmentally sound. Section 4.4 provides an overview of the state's process for determining the technical feasibility, cost-effectiveness and environmental soundness for each project. Additional considerations will be made for communities that are found to have the highest risks, repetitive loss properties, and/or the most intense development pressures

All projects recommended for funding will be reviewed to determine the extent to which the project benefits are maximized in relationship to the project cost. However, the state will not use this as criteria for ranking local submitted projects, as the Department Rule 9G-22 requires local mitigation strategy working groups to prioritize and rank locally

submitted projects. For a full discussion of methodology used by the state to determine project cost effectiveness for FEMA funded projects, please refer to Section 4.4- Evaluation of Mitigation Measures for Technical Feasibility.

The state will make every effort to fund all cost effective, eligible and technically feasible projects that are submitted for mitigation funding by eligible applicants. In those instances where cost effective, eligible and technically feasible projects are submitted under a specific grant program and found to meet all applicable program eligibility requirements, however, because of funding restraints or lack of available funds, if the project is not funded, the project will be recommended to the next available funding source for which it qualifies. For example an acquisition of repetitive loss structure project is submitted under HMGP and meets all program eligibility requirements and is not funded due to limited amount of available HMGP funds. This project will be provided to the FMA staff for consideration under the next funding cycle.

The strategy listed below is the criteria by which the department will prioritize communities that receive project related grants under the FMA, HMGP and PDM programs.

Hazard Mitigation Grant Program Project Grants

Funding allocations and project funding is provided below and will be in accordance with the Departments' HMGP Administrative Rule, Chapter 9G-22 (Section 9G-22.006) Florida Administrative Code and HMGP Administrative Plan.

1. The available HMGP funds shall be allocated to counties included in the relevant presidential disaster declaration, in proportion to each county's share of federal disaster funding from the Public Assistance, Individual Assistance and Small Business Administration programs as of 90-days after the disaster declaration as reported by FEMA.
2. Eligibly submitted projects for each county included in the relevant presidential disaster declaration will be funded in order of priority as outlined in the LMS until the allocated funds are exhausted or all eligible projects are funded, whichever occurs first.
3. Any allocation remaining after all eligible projects in any declared county are funded, shall be reallocated to those counties included in the relevant presidential disaster declaration whose allocation was not sufficient to fund all submitted eligible projects in proportion to each county's share of unfunded projects.
4. If funds remain after all eligible projects under subsection (1) above have been funded, then they shall be applied to fund eligible projects submitted from counties not included in the relevant presidential disaster declaration on a first-come-first-served basis until all available funds are obligated.

Flood Mitigation Assistance Project Grants

To be eligible for FMA Project Grant funds, a community must be a compliant participant, which is not on probation or suspended, in the National Flood Insurance Program (NFIP). Additionally, funding allocations and project funding is provided below and will be in accordance with the Departments' FMA Administrative Plan and Memorandum of Understanding for Managing State.

1. Funds will be made available to those communities that are perceived to have the highest risk based upon the number of structures that appear on the FEMA Targeted Repetitive Loss Properties list. From that list, an estimated 1000 properties are located in Florida. Appropriate funding consideration will be given to the targeted repetitive loss properties and those properties with the highest risk that will result in the greatest savings to the National Flood Insurance Fund.
2. Any residual funds will be made available to all other communities participating in the NFIP.
3. Eligible submitted projects for each community will be funded in order of priority as outlined in the submittal letter from the LMS until the allocated funds are exhausted, or all eligible projects are funded, whichever occurs first.
4. Further, the FMA project approvals will be done in accordance with the Memorandum of Understanding. FMA funding for Repetitive Loss Projects will be awarded as following:
 - a. Structures that are substantially damaged;
 - b. Structures with four or more losses that exceed the value of the structure;
 - c. Structures with two or more losses in a ten-year period, where the cumulative payments exceed the fair market value of the structure; and
 - d. Structures with two or more losses in a ten-year period, where the cumulative payments do not exceed the fair market value of the structure.

Irrespective of the above priorities, the department may use its discretion and consider "hardship projects" for approval.

Pre-Disaster Mitigation Project Grants

Since funding for PDM-C related projects are competitive nationwide, the available funds will be distributed to those communities that have clearly demonstrated both the ability and the desire to complete project applications that score in the upper percentile in the National Evaluation process. The state will accept PDM-C applications from only NFIP participating communities that have an FEMA approved LMS. Additionally, the state will not give priority to one PDM-C eligible community over another. All project applications submitted under PDM-C will be reviewed and ranked based upon the following criteria:

1. Projects submitted must be included in the community's list of prioritized initiatives;
2. Eligibility of the Applicants and sub-applicants;
3. Eligibility of proposed activities and cost;
4. Eligibility and availability of non-federal cost share;
5. Consistency of mitigation projects with the state and FEMA-approved LMS as well as the State Mitigation Plan;
6. Feasibility of mitigation projects;
7. Benefit cost ratio of at least 1.0 for mitigation projects, including substantially damaged structures. Applicants are required to complete their own Benefit Cost Analysis. Mitigation projects with a benefit cost ratio less than 1.0 will not be considered;
8. Development pressures facing the community;
9. Technical accuracy, complete supporting documentation, and source credibility of the BCA;
10. Complete responses to the Environmental/Historic Preservation Established Questions and supporting documentation for mitigation projects and inclusion of appropriate treatment measures in project cost; and
11. Complete responses to Supplemental Questions for National Ranking and Evaluation.