Local Mitigation Plan Review Tool

Cover Page

The Local Mitigation Plan Review Tool (PRT) 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 local governments, including special districts.

1. The Multi-Jurisdictional Summary Sheet is a worksheet that is used to document how each jurisdiction met the requirements of the plan elements (Planning Process; Risk Assessment; Mitigation Strategy; Plan Maintenance; Plan Update; and Plan Adoption).
2. The Plan Review Checklist summarizes FEMA’s evaluation of whether the plan has addressed all requirements.

*For greater clarification of the elements in the Plan Review Checklist, please see Section 4 of this guide. Definitions of the terms and phrases used in the PRT can be found in Appendix E of this guide.*

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|  | Plan Information |
| Jurisdiction(s) | Jefferson County, PA  |
| Title of Plan | Jefferson County 2023 Hazard Mitigation Plan |
| New Plan or Update | Update |
| Single- or Multi-Jurisdiction | Multi-jurisdiction |
| Date of Plan | 9/1/2023 |
|  | Local Point of Contact |
| Title | Click or tap here to enter text. |
| Agency | Click or tap here to enter text. |
| Address | Click or tap here to enter text. |
| Phone Number | Click or tap here to enter text. |
| Email | Click or tap here to enter text. |

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|  | Additional Point of Contact |
| Title | Click or tap here to enter text. |
| Agency | Click or tap here to enter text. |
| Address | Click or tap here to enter text. |
| Phone Number | Click or tap here to enter text. |
| Email | Click or tap here to enter text. |

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|  | Review Information |
|  | State Review |
| State Reviewer(s) and Title | Ernie Szabo |
| State Review Date | Click or tap to enter a date. |
|  | FEMA Review |
| FEMA Reviewer(s) and Title | Matt McCullough |
| Date Received in FEMA Region | Click or tap to enter a date. |
| Plan Not Approved | Click or tap to enter a date. |
| Plan Approvable Pending Adoption | Click or tap to enter a date. |
| Plan Approved | Click or tap to enter a date. |

Multi-Jurisdictional Summary Sheet

In the boxes for each element, mark if the element is met (Y) or not met (N).

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| # | Jurisdiction Name | A. Planning Process | B. Risk Assessment | C. Mitigation Strategy | D. Plan Maintenance | E. PlanUpdate | F. Plan Adoption | G. State Requirements |
| 1 | Barnett Township |  |  |  |  |  |  |  |
| 2 | Beaver Township |  |  |  |  |  |  |  |
| 3 | Bell Township |  |  |  |  |  |  |  |
| 4 | Big Run Borough |  |  |  |  |  |  |  |
| 5 | Brockway Borough |  |  |  |  |  |  |  |
| 6 | Brookville Borough |  |  |  |  |  |  |  |
| 7 | Clover Township |  |  |  |  |  |  |  |
| 8 | Corsica Borough |  |  |  |  |  |  |  |
| 9 | Eldred Township |  |  |  |  |  |  |  |
| 10 | Falls Creek Borough |  |  |  |  |  |  |  |
|  | Gaskill Township |  |  |  |  |  |  |  |
|  | Heath Township |  |  |  |  |  |  |  |
|  | Henderson Township |  |  |  |  |  |  |  |
|  | Knox Township |  |  |  |  |  |  |  |
|  | McCalmont Township |  |  |  |  |  |  |  |
|  | Oliver Township |  |  |  |  |  |  |  |
|  | Perry Township |  |  |  |  |  |  |  |
|  | Pine Creek Township |  |  |  |  |  |  |  |
|  | Polk Township |  |  |  |  |  |  |  |
|  | Porter Township |  |  |  |  |  |  |  |
|  | Punxsutawney Borough |  |  |  |  |  |  |  |
|  | Reynoldsville Borough |  |  |  |  |  |  |  |
|  | Ringgold Township |  |  |  |  |  |  |  |
|  | Rose Township |  |  |  |  |  |  |  |
|  | Snyder Township |  |  |  |  |  |  |  |
|  | Summerville Borough |  |  |  |  |  |  |  |
|  | Sykesville Borough |  |  |  |  |  |  |  |
|  | Timblin Borough |  |  |  |  |  |  |  |
|  | Union Township |  |  |  |  |  |  |  |
|  | Warsaw Township |  |  |  |  |  |  |  |
|  | Washington Township |  |  |  |  |  |  |  |
|  | Winslow Township |  |  |  |  |  |  |  |
|  | Worthville Borough |  |  |  |  |  |  |  |
|  | Young Township |  |  |  |  |  |  |  |
|  | Brockway Area School |  |  |  |  |  |  |  |
|  | Brookville Area School |  |  |  |  |  |  |  |
|  | Jefferson County |  |  |  |  |  |  |  |
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Plan Review Checklist

The Plan Review Checklist is completed by FEMA. States and local governments are encouraged, but not required, to use the PRT as a checklist to ensure all requirements have been met prior to submitting the plan for review and approval. 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.” FEMA completes the “required revisions” summary at the bottom of each element to clearly explain the revisions that are required for plan approval. Required revisions must be explained for each plan sub-element that is “not met.” Sub-elements in each summary should be referenced using the appropriate numbers (A1, B3, etc.), where applicable. Requirements for each element and sub-element are described in detail in Section 4: Local Plan Requirements of this guide.

Plan updates must include information from the current planning process.

If some elements of the plan do not require an update, due to minimal or no changes between updates, the plan must document the reasons for that.

Multi-jurisdictional elements must cover information unique to all participating jurisdictions.

Element A: Planning Process

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| --- | --- | --- |
| Element A Requirements  | Location in Plan(section and/or page number) | Met / Not Met |
| A1. Does the plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction? (Requirement 44 CFR § 201.6(c)(1)) |  |  |
| A1-a. Does the plan document how the plan was prepared, including the schedule or time frame and activities that made up the plan’s development, as well as who was involved? | Section 3, Appendix C | Met |
| A1-b. Does the plan list the jurisdiction(s) participating in the plan that seek approval, and describe how they participated in the planning process? | Section 3, Appendix C | Not Met |
| A2. Does the plan document 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? (Requirement 44 CFR § 201.6(b)(2)) |  |  |
| A2-a. Does the plan identify all stakeholders involved or given an opportunity to be involved in the planning process, and how each stakeholder was presented with this opportunity?  | Section 3, Appendix C | Not Met |
| A3. Does the plan document how the public was involved in the planning process during the drafting stage and prior to plan approval? (Requirement 44 CFR § 201.6(b)(1)) |  |  |
| A3-a. Does the plan document how the public was given the opportunity to be involved in the planning process and how their feedback was included in the plan?  | Section 3.4  | Not Met |
| A4. Does the plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement 44 CFR § 201.6(b)(3)) |  |  |
| A4-a. Does the plan document what existing plans, studies, reports and technical information were reviewed for the development of the plan, as well as how they were incorporated into the document? | Section 2.5 | Met |

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| Element A Required Revisions |
| Required Revision**:** **A1-b.) Note:**The following communities did not participate in the planning process: Barnett Township, Summerville Borough, Winslow Township.**A1-b.) Required Revision:** Brookville & Brockway Area Schools are listed in the Plan Review Tool as having participated. They are not reflected as having participated in Table 10, Pg. 44 in the plan itself. Also, please clarify if these are singular or multiple organizations, as they are listed as Brookville & Brockway Area School”s” in Table 8, pg. 40. I am only trying to clarify if there are representing multiple school sites. Table 8, pg. 41 was updated to reflect Brookville Area School District, Brockway Area School District, and Punxsutawney Area School District (multiple organizations). **A2.) Required Revision:**Section 3 - Please demonstrate how organizations who represent/support underserved communities and socially vulnerable populations were provide the opportunity to participate in the planning process. If these organizations did not participate, please develop a specific strategy to engage them in the next plan update. Table 78, pg. 291 added Objective 3.5.; Table 80, pg. 304 added Actions 3.5.1, 3.5.2, 3.5.3, and 3.5.4. Table 81, pg. 310. Table 82, pg. 312. Table 83, pg. 312 – 314.**A3.) Required Revision:** Section 3 - Please demonstrate how underserved communities and vulnerable populations were provided the opportunity to participate in the planning process. If these populations did not participate in the participate, please develop a specific strategy to engage them in the next plan update. Table 78, pg. 291 added Objective 3.5.; Table 80, pg. 304 added Actions 3.5.1, 3.5.2, 3.5.3, and 3.5.4. Table 81, pg. 310. Table 82, pg. 312. Table 83, pg. 312 – 314. |

Element B: Risk Assessment

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| Element B Requirements | Location in Plan(section and/or page number) | Met / Not Met |
| B1. Does the plan include a description of the type, location, and extent of all natural hazards that can affect the jurisdiction? Does the plan also include information on previous occurrences of hazard events and on the probability of future hazard events? (Requirement 44 CFR § 201.6(c)(2)(i)) |  |  |
| B1-a. Does the plan describe all natural hazards that can affect the jurisdiction(s) in the planning area, and does it provide the rationale if omitting any natural hazards that are commonly recognized to affect the jurisdiction(s) in the planning area? | Section 4 | Met |
| B1-b. Does the plan include information on the location of each identified hazard? | Section 4 | Met |
| B1-c. Does the plan describe the extent for each identified hazard? | Section 4 | Met |
| B1-d. Does the plan include the history of previous hazard events for each identified hazard? | Section 4 | Met |
| B1-e. Does the plan include the probability of future events for each identified hazard? Does the plan describe the effects of future conditions, including climate change (e.g., long-term weather patterns, average temperature and sea levels), on the type, location and range of anticipated intensities of identified hazards? | Section 4.2.3, Table 70, Section 4 | Not Met |
| B1-f. For participating jurisdictions in a multi‐jurisdictional plan, does the plan describe any hazards that are unique to and/or vary from those affecting the overall planning area? | Section 4 | Met |
| B2. Does the plan include a summary of the jurisdiction’s vulnerability and the impacts on the community from the identified hazards? Does this summary also address NFIP-insured structures that have been repetitively damaged by floods? (Requirement 44 CFR § 201.6(c)(2)(ii)) |  |  |
| B2-a. Does the plan provide an overall summary of each jurisdiction’s vulnerability to the identified hazards?  | Section 4 | Not Met |
| B2-b. For each participating jurisdiction, does the plan describe the potential impacts of each of the identified hazards on each participating jurisdiction? | Section 4 | Met |
| B2-c. Does the plan address NFIP-insured structures within each jurisdiction that have been repetitively damaged by floods? | Section 4 | Met |

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| Element B Required Revisions |
| Required Revision**:** **B1-e.) Required Revision:**Please provide a narrative describing how future conditions could affect this hazard: Pg. 70 Earthquake, Pg. 97 Landslide, Pg. 107 Radon, Pg. 114 Sinkhole If these hazards are not affected by future conditions, please state so. Verbiage added for: Earthquake, pg. 72, Landslide, pg. 103, Radon, pg. 115, Sinkhole, pg. 121.**B2-a.) Required Revision:**Pg. 64- Please provide an accounting of at-risk assets for Drought (Crops, Acreage, etc…)Information added to vulnerability assessment (section 4.3.1.5) to discuss vulnerable assets. Pg. 64.Pg. 71- Please provide an accounting of at-risk assets for Earthquake (masonry structure numbers per jurisdiction, infrastructure numbers. Etc…) Information added on historic properties, including construction aspects, cultural districts, and infrastructure that could be at risk of earthquakes. Pg. 73 – 74. Pg. 95 & 119 – Please provide an accounting for at-risk assets for Hurricane and Tropical Storm/Tornado & Windstorm. Section 4.3.8 is referenced in the Vulnerability section ( 4.3.4.5) Mobile homes are noted as being at higher risk in this section. The plan could provide numbers for each community for those structure types. Information on the number of mobile homes by municipality added to section 4.3.4.5. Pg. 99-100. Information on the number of mobile homes by municipality added to section 4.3.8.5. Pg. 135-136. **B2-a.) Question:** Pg. 134- Wildfire – Figure 26: Does the County have a breakdown of the critical infrastructure facilities, functional needs facilities within the WUI? Information added to section 4.3.9.5 discussing community lifelines and historic properties in high-density WUI areas. Pg. 143.**B2-a.) Recommended Revision**Table 29: For the next plan update, identify what the Structure Type & Use is for all structures with address points in the SFHA. (1,779)**B2-a.) Kudos**Table 30: Facility Type has been identified for the Community Lifelines. Recommended Revision:Ask Plan Participants to provide context for use/function, number of community members served by each facility. This type of information can help prioritize why a facility should be mitigated from the identified hazard. **B2-b.) Recommended Revision:**Table 3 & Section 2.4- How are populations and land use/development patterns, combined with future hazard conditions affecting risk? For the next plan update, please provide this narrative specific for each hazard. Section 4.4.4- Please specifically include socially vulnerable population considerations for this assessment. **B2-c.) Note:**For the next plan update, please breakout the SRL numbers in terms of types (residential, commercial, etc….) |

Element C: Mitigation Strategy

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| Element C Requirements | Location in Plan(section and/or page number) | Met / Not Met |
| C1. Does the plan document each participant’s existing authorities, policies, programs and resources and its ability to expand on and improve these existing policies and programs? (Requirement 44 CFR § 201.6(c)(3)) |  |  |
| C1-a. Does the plan describe how the existing capabilities of each participant are available to support the mitigation strategy? Does this include a discussion of the existing building codes and land use and development ordinances or regulations? | Section 5, Appendix C | Met |
| C1-b. Does the plan describe each participant’s ability to expand and improve the identified capabilities to achieve mitigation?  | Section 5, Appendix C | Not Met |
| C2. Does the plan address each jurisdiction’s participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement 44 CFR § 201.6(c)(3)(ii)) |  |  |
| C2-a. Does the plan contain a narrative description or a table/list of their participation activities? | Section 5, Appendix C | Not Met |
| C3. Does the plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement 44 CFR § 201.6(c)(3)(i)) |  |  |
| C3-a. Does the plan include goals to reduce the risk from the hazards identified in the plan? | Pg. 272-275 | Met |
| 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 44 CFR § 201.6(c)(3)(ii)) |  |  |
| C4-a. Does the plan include an analysis of a comprehensive range of actions/projects that each jurisdiction considered to reduce the impacts of hazards identified in the risk assessment? | Table 80 & 81 | Met |
| C4-b. Does the plan include one or more action(s) per jurisdiction for each of the hazards as identified within the plan’s risk assessment? | Table 80 & 81 | Met |
| C5. Does the plan contain an action plan that describes how the actions identified will be prioritized (including a cost-benefit review), implemented, and administered by each jurisdiction? (Requirement 44 CFR § 201.6(c)(3)(iv)); (Requirement §201.6(c)(3)(iii)) |  |  |
| C5-a. Does the plan describe the criteria used for prioritizing actions?  | Appendix H | Not Met |
| C5-b. Does the plan provide the position, office, department or agency responsible for implementing/administrating the identified mitigation actions, as well as potential funding sources and expected time frame? | Table 80 | Not Met |

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| Element C Required Revisions |
| Required Revision**:** **C1-b) Required Revision:**Please provide a write-up that discuss opportunities to expand and improve the capabilities established in Section 5. Information added to section 5 capability assessment addressing opportunities to expand. Pg. 281**C2-a.) Required Revision:**Please provide an additional write-up that addresses SI/SD implementation (assessment process, personnel, training, etc….). If this information is not readily available from communities, please provide a county-wide action that requests training be provided to bolster this section of each community’s floodplain administration. Action 2.6.2 added to discuss substantial damage/substantial improvement. Pg. 301.**C5-a.) Required Revision:**Please provide a narrative that clearly expresses how cost-benefit of each action is built into the criteria for prioritizing actions. Mitigation action evaluation and prioritization information added to section 6.4. This information includes discussion on funding, and efficiency (to which time, effort, and cost are well spent). Pg. 297-298.**C5-b.) Required Revision:**Table 80- Please provide all known/possible funding sources that are applicable to each action. Example Action 2.6.1- FEMA HMGP & HMA programs should be noted. Please check and document all actions for additional funding sources. Updated funding notes added to action in Table 80 were applicable. Pg. 299-306. |

Element D: Plan Maintenance

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| Element D Requirements | Location in Plan(section and/or page number) | Met / Not Met |
| D1. Is there discussion of how each community will continue public participation in the plan maintenance process? (Requirement 44 CFR § 201.6(c)(4)(iii)) |  |  |
| D1-a. Does the plan describe how communities will continue to seek future public participation after the plan has been approved? | Pg. 300, Section 7.3 | Met |
| D2. Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a five-year cycle)? (Requirement 44 CFR § 201.6(c)(4)(i)) |  |  |
| D2-a. Does the plan describe the process that will be followed to track the progress/status of the mitigation actions identified within the Mitigation Strategy, along with when this process will occur and who will be responsible for the process? | Pg. 299, Section 7.2 | Met |
| D2-b. Does the plan describe the process that will be followed to evaluate the plan for effectiveness? This process must identify the criteria that will be used to evaluate the information in the plan, along with when this process will occur and who will be responsible. | Section 7.2 | Met |
| D2-c. Does the plan describe the process that will be followed to update the plan, along with when this process will occur and who will be responsible for the process? | Section 7.2 | Met |
| D3. Does the plan describe a process by which each community will integrate the requirements of the mitigation plan into other planning mechanisms, such as comprehensive or capital improvement plans, when appropriate? (Requirement 44 CFR § 201.6(c)(4)(ii)) |  |  |
| D3-a. Does the plan describe the process the community will follow to integrate the ideas, information and strategy of the mitigation plan into other planning mechanisms? | Section 5.2.5 | Met |
| D3-b. Does the plan identify the planning mechanisms for each plan participant into which the ideas, information and strategy from the mitigation plan may be integrated? | Section 5 | Met |
| D3-c. For multi-jurisdictional plans, does the plan describe each participant's individual process for integrating information from the mitigation strategy into their identified planning mechanisms? | Section 5.2.5 | Not Met |

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| Element D Required Revisions |
| Required Revision**:** **D2-b.)** **Recommended Revisions:**Develop more specific evaluation criteria to gauge advancement, improvement, completion or need for adjustments to the risk assessment, capability assessment and action strategies. **D3-c.) Required Revision:**Please provide a general integration process for communities within Jefferson County. Information added to section 5.2.5 plan integration. Pg. 282. |

Element E: Plan Update

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| Element E Requirements  | Location in Plan(section and/or page number) | Met / Not Met |
| E1. Was the plan revised to reflect changes in development? (Requirement 44 CFR § 201.6(d)(3)) |  |  |
| E1-a. Does the plan describe the changes in development that have occurred in hazard-prone areas that have increased or decreased each community’s vulnerability since the previous plan was approved? | Section 2.4, Section 4.4.4 | Met |
| E2. Was the plan revised to reflect changes in priorities and progress in local mitigation efforts? (Requirement 44 CFR § 201.6(d)(3)) |  |  |
| E2-a. Does the plan describe how it was revised due to changes in community priorities? | Table 76 | Met |
| E2-b. Does the plan include a status update for all mitigation actions identified in the previous mitigation plan? | Table 77 | Met |
| E2-c. Does the plan describe how jurisdictions integrated the mitigation plan, when appropriate, into other planning mechanisms? | Section 5.2.5 | Not Met |

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| Element E Required Revisions |
| Required Revision**:** **E1-a.) Note:**Please see Recommended Revision for Element B2-b.) **E2-c.) Required Revision:**If jurisdictions have not integrated the mitigation plan into other mechanisms, please state so. Information on this item has been added to section 5.2.5 to discuss the light integration of HMP principles into other jurisdictional planning mechanisms. Pg. 282 |

Element F: Plan Adoption

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| Element F Requirements | Location in Plan(section and/or page number) | Met / Not Met |
| F1. For single-jurisdictional plans, has the governing body of the jurisdiction formally adopted the plan to be eligible for certain FEMA assistance? (Requirement 44 CFR § 201.6(c)(5)) |  |  |
| F1-a. Does the participant include documentation of adoption? | N/A | Choose an item. |
| F2. For multi-jurisdictional plans, has the governing body of each jurisdiction officially adopted the plan to be eligible for certain FEMA assistance? (Requirement 44 CFR § 201.6(c)(5)) |  |  |
| F2-a. Did each participant adopt the plan and provide documentation of that adoption? | N/A | Choose an item. |

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| Element F Required Revisions |  |  |
| Required Revision**:** Click or tap here to enter text. |  |  |

Element G: High Hazard Potential Dams (Optional)

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| HHPD Requirements | Location in Plan(section and/or page number) | Met / Not Met |
| HHPD1. Did the plan describe the incorporation of existing plans, studies, reports and technical information for HHPDs? |  |  |
| HHPD1-a. Does the plan describe how the local government worked with local dam owners and/or the state dam safety agency? | Section 4.3.12 | Not Met |
| HHPD1-b. Does the plan incorporate information shared by the state and/or local dam owners? | Section 4.3.12 | Met |
| HHPD2. Did the plan address HHPDs in the risk assessment? |  |  |
| HHPD2-a. Does the plan describe the risks and vulnerabilities to and from HHPDs? | Section 4.3.12.5 | Not Met |
| HHPD2-b. Does the plan document the limitations and describe how to address deficiencies? | Section 4.3.12 | Met |
| HHPD3. Did the plan include mitigation goals to reduce long-term vulnerabilities from HHPDs? |  |  |
| HHPD3-a. Does the plan address how to reduce vulnerabilities to and from HHPDs as part of its own goals or with other long-term strategies? | Section 6.2 | Met |
| HHPD3-b. Does the plan link proposed actions to reducing long-term vulnerabilities that are consistent with its goals? | Table 80, Section 6.2 | Met |
| HHPD4-a. Did the plan include actions that address HHPDs and prioritize mitigation actions to reduce vulnerabilities from HHPDs? |  |  |
| HHPD4-a. Does the plan describe specific actions to address HHPDs? | Table 80 | Not Met |
| HHPD4-b. Does the plan describe the criteria used to prioritize actions related to HHPDs? | Appendix H | Met |
| HHPD4-c. Does the plan identify the position, office, department or agency responsible for implementing and administering the action to mitigate hazards to or from HHPDs? | Table 80 | Met |

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| HHPD Required Revisions |
| Required Revision**:** **HHPD1-a.) Required Revision:**Please provide specific information that documents how PADEP and/or local dam owners were involved in the planning process. If they were not involved, please provide a strategy for their inclusion in the next plan update. Action 5.2.2 added to the mitigation action plan to address continued participation for public and private dam owners. Table 80. Pg. 306.**HHPD2-a.) Required Revision:**Please include a narrative write-up for the following risk considerations for HHPDs:* Potential cascading impacts of storms, seismic events, landslides, wildfire and other hazards that might affect a dam’s flooding potential

Information on cascading hazards added to section 4.3.12.5 on major storms, hurricanes, seismic events, and wildfires as cascading hazards to dam failures. Pg. 169 – 170.**HHPD2-a.) Note:**Data limitations are noted for vulnerability information. Update data limitations were added to the limitation discussion. Pg. 169**HHPD4-a.) Required Revision:**Expand the mitigation strategy types associated to HHPDs. Suggestion- review latest HHPD Notice of Funding Opportunity and include all eligible project types. Additional action added to HHPD section. This action is a different mitigation action type. Action 5.2.2 added to the mitigation plan. Table 80. Pg. 306. |

Element H: Additional State Requirements (Optional)

|  |  |  |
| --- | --- | --- |
| Element H Requirements | Location in Plan(section and/or page number) | Met / Not Met |
| This space is for the State to include additional requirements. |  |  |
| Click or tap here to enter text. | Click or tap here to enter text. | Choose an item. |

Plan Assessment

These comments can be used to help guide your annual/regularly scheduled updates and the next plan update.

Element A. Planning Process

Strengths

[insert comments]

Opportunities for Improvement

[insert comments]

Element B. Risk Assessment

Strengths

[insert comments]

Opportunities for Improvement

[insert comments]

Element C. Mitigation Strategy

Strengths

[insert comments]

Opportunities for Improvement

[insert comments]

Element D. Plan Maintenance

Strengths

[insert comments]

Opportunities for Improvement

[insert comments]

Element E. Plan Update

Strengths

[insert comments]

Opportunities for Improvement

[insert comments]

Element G. HHPD Requirements (Optional)

Strengths

[insert comments]

Opportunities for Improvement

[insert comments]

Element H. Additional State Requirements (Optional)

Strengths

[insert comments]

Opportunities for Improvement

[insert comments]