

LOCAL MITIGATION PLAN REVIEW – City of Salem NHMP Update Focus List 09/06/2022

REGULATION CHECKLIST	What’s New? <sup>1</sup>	2017 Plan Strengths	2017 Opportunities for Improvement	DLCD Suggestions & Assignments
Regulation (44 CFR 201.6 Local Mitigation Plans)				
ELEMENT A: PLANNING PROCESS				
<p><b>A1. Does the plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction? (Requirement 44 CFR § 201.6(c)(1))</b></p> <p><b>A1-a.</b> The plan must describe the current planning process. Documentation requirements typically are met with a narrative description, but may also include other records such as copies of meeting minutes, sign-in sheets or newspaper articles. When a narrative description is provided, supporting documentation such as meeting minutes, sign-in sheets, etc., does not need to be included in the plan itself. Planners are encouraged to retain supporting documentation in a Plan Appendix as a record of how decisions were made and who was involved.</p> <p><b>A1-b.</b> The plan must list the representatives from each of the participants in the current plan that will seek approval, and how they participated in the planning process.</p> <p>The plan must identify who participated, by agency and title.</p>	<p><b>STEERING COMMITTEE JURISDICTIONS/DISTRICTS</b></p> <p>Emphasis is placed on the planning process, including how it was prepared and who was involved. This includes the following:</p> <ol style="list-style-type: none"> <li><u>Jurisdictions/Districts</u> (who) seeking FEMA approval <u>must</u> be identified by agency and title.</li> </ol>	<p>✓ Diverse steering committee.</p>	<p>✓ No comments provided</p>	<ul style="list-style-type: none"> <li>Review, revise and update, where appropriate</li> <li>Document this information</li> <li><u>Document</u> the who and how of the plan holders who participated. <ul style="list-style-type: none"> <li>Include <u>how</u> the plan holders participated in the planning process.</li> </ul> </li> <li>Make sure whole community has been invited, including lifelines, underserved/socially vulnerable communities, and others</li> </ul>
<p><b>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))</b></p> <p><b>A2-a.</b> The plan must provide documentation of an opportunity for stakeholders to be involved in the current planning process. Documentation of this opportunity must identify how <u>each</u> of the following types of stakeholders were presented with this opportunity, as applicable.</p> <ol style="list-style-type: none"> <li>Local and regional agencies involved in hazard mitigation activities</li> <li>Agencies that have the authority to regulate development</li> <li>Neighboring communities</li> <li>Representatives of businesses, academia, and other private organizations</li> <li>Representatives of nonprofit organizations, including community-based organizations, that work directly with and/or provide support to underserved communities and socially vulnerable populations, among others</li> </ol>	<p><b>STAKEHOLDERS/INTERESTED PARTIES</b></p> <p>The following <u>types</u> of stakeholders from the whole community must be provided an opportunity to participate:</p> <ol style="list-style-type: none"> <li><u>Community lifelines</u> <ul style="list-style-type: none"> <li>Safety and Security</li> <li>Food, Water, Shelter</li> <li>Health and Medical</li> <li>Energy</li> <li>Communications</li> <li>Transportation</li> <li>Hazardous Material</li> </ul> </li> <li><u>Underserved communities and socially vulnerable populations</u>, or representatives of nonprofit organizations that work directly with and/or provide for these individuals.</li> </ol> <p><u>Document how each of the types of stakeholders were presented with the opportunity to participate.</u></p>	<p>✓ No comments provided</p>	<p>✓ No comments provided</p>	<ul style="list-style-type: none"> <li>Review, revise and update, where appropriate</li> <li>Make sure whole community has been invited, including lifeline representatives, representatives of underserved and socially vulnerable communities, and others listed in A2.</li> </ul>

<sup>1</sup> On April 19, 2022, FEMA issued the Local Mitigation Planning Policy Guide (FP 206-21-0002) that revised its official policy on and interpretation (including more term definitions) of the applicable statutes and mitigation planning regulations in 44 Code of Federal Regulations (CFR) Part 201. However, the text of 44 CFR Part 201 remains unchanged.

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<p><b>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))</b></p> <p><b>A3-a.</b> <i>The plan must document how the public had an opportunity to be involved in the current planning process, and what that participation entailed, including how underserved communities and vulnerable populations within the planning area were provided an opportunity to be involved. The opportunity must occur during the plan’s development, which means prior to the plan’s submission for formal review. In addition, the plan must document how public feedback was included throughout the planning process.</i></p>	<p><b>PUBLIC</b></p> <p>Emphasis is placed on opportunities for the public to be involved during the planning process. This includes the following:</p> <ol style="list-style-type: none"> <li>1. <u>How</u> the public was presented with the opportunity to be involved.</li> <li>2. <u>What</u> the public participation entailed</li> <li>3. <u>When</u> the public participation occurred (<u>must</u> be during the planning process)</li> <li>4. <u>Document</u> the public feedback throughout the planning process</li> </ol>	<p>✓ <i>Helpful public outreach survey that gathered useful information for developing mitigation strategies or conducting public awareness campaigns.</i></p>	<p>✓ <i>Consider alternative methods of public outreach to increase participation, gauged by the number of public comments.</i></p>	<ul style="list-style-type: none"> <li>• Review, revise and update, where appropriate</li> <li>• Make sure whole community has been invited, including underserved and socially vulnerable communities, or representatives.</li> </ul>
<p><b>A4. Does the plan describe the review and incorporation of existing plans, studies, reports and technical information? (Requirement 44 CFR § 201.6(b)(3))</b></p> <p><b>A4-a.</b> <i>The plan must document what existing plans, studies, reports and technical information were reviewed and how they were incorporated, if appropriate, into the development/update of the plan.</i></p> <p><i>For jurisdictions with structures for which National Flood Insurance Program (NFIP) coverage is available, regulatory flood mapping products are required to be incorporated, if appropriate.</i></p>	<p>Participants may use other jurisdiction-specific materials, including non-regulatory flood mapping products, that improve upon FIP regulatory flood mapping products.</p>	<p>✓ <i>Unique and helpful Community Connectivity Capacity. Good synthesis for social and cultural resources that can inform mitigation and outreach strategies to support efforts outside of the hazard mitigation plan.</i></p>	<p>✓ <i>Consider deleting the duplication of the ‘Understanding Risk’ graphic.</i></p>	<ul style="list-style-type: none"> <li>• Document <u>what</u> “existing” documents were reviewed and <u>how</u> they were incorporated. Such documents may include: <ul style="list-style-type: none"> <li>○ Plans</li> <li>○ Studies</li> <li>○ Reports</li> <li>○ Technical information</li> <li>○ National Flood Insurance Program (NFIP) information, if applicable.</li> </ul> </li> <li>• All existing Information needs to be reviewed and updated, where appropriate.</li> <li>• We will include DOGAMI/OCCRI reports and CWPP information from Marion County.</li> </ul>

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<b>ELEMENT B: RISK ASSESSEMENT</b>				
<p><b>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))</b></p> <p><b>B1-a.</b> The plan must include a description of all natural hazards that can affect the jurisdiction(s) in the planning area and their assets, such as dams, located outside of the planning area. This requirement may be met with either a narrative description or definition.</p> <p>The plan must provide the rationale if omitting any natural hazards that are commonly recognized to affect the participant(s) in the planning area. There is no prescribed method for explaining the omission, but the plan must demonstrate the lack of risk to the participant(s) that omits the hazard.</p> <p><b>B1-b.</b> The plan must include information on location for each identified hazard.</p> <p><b>B1-c.</b> The plan must provide the extent of the hazards that can affect the planning area. When describing extent using charts or scales (e.g., Saffir-Simpson scale for hurricane wind speed; Enhanced Fujita scale for tornado), the plan must document how the scale applies to each jurisdiction.</p> <p><b>B1-d.</b> The plan must include information on previous hazard events for each hazard that affects the planning area. At a minimum, this includes any state and federal major disaster declarations for the planning area since the last update.</p> <p><b>B1-e.</b> The plan must include the probability of future events for the identified hazards that can affect the planning area. Probability may be met in a variety of ways; however, general descriptors must be quantitatively defined.</p> <p>Probability must include 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.</p> <p><b>B1-f.</b> For multi-jurisdictional plans, when hazard risks differ across the planning area and between participating jurisdictions, the plan must specify the unique and varied risk information for each applicable jurisdiction and their assets outside the planning area.</p>	<p>Emphasis placed on the following:</p> <ul style="list-style-type: none"> <li>• <u>High Hazard Potential Dams (HHPD)</u>. This has been established as a stand-alone hazard.</li> <li>• <u>Extent</u>. When describing extent using charts or scales (e.g., Saffir-Simpson scale for hurricane wind speed; Enhanced Fujita scale for tornado), the plan must document how the scale applies to each jurisdiction.</li> <li>• <u>Previous Occurrences</u>. At a minimum, include State and Federal major disaster declarations in the planning area, even if the jurisdiction was not impacted. If no events have occurred for a specific hazard, the plan must state that.</li> <li>• <u>Future Probability</u>. This must include the effects of future conditions, including climate change, on the type, location, and range of anticipated intensities of identified hazards.</li> <li>• <u>Probability</u>. If general descriptors of probability are used, they must be quantified or defined.</li> </ul>	<ul style="list-style-type: none"> <li>✓ <i>Good Calculated Risk Priority Index that clearly lays out the overall risk of the city to each hazard.</i></li> <li>✓ <i>Clear and helpful summaries of changes since the previous plan at the beginning of each hazard assessment section.</i></li> </ul>	<ul style="list-style-type: none"> <li>✓ No comments provided</li> </ul>	<ul style="list-style-type: none"> <li>• The plan shall identify and analyze all hazards that can affect participating jurisdictions and shall include: <ul style="list-style-type: none"> <li>○ <u>Description</u>. All hazards that can affect jurisdiction</li> <li>○ <u>Location</u>. Where each hazard might affect the planning area</li> <li>○ <u>Extent</u>. Potential magnitude</li> <li>○ <u>How Often</u>. Previous occurrences and future probability</li> <li>○ <u>Vulnerability</u>. What parts of the community are most likely to be affected</li> <li>○ <u>Impacts</u>. Potential consequences</li> </ul> </li> <li>• Review and update all hazard data which will include new DOGAMI/ OCCRI reports from Marion County.</li> <li>• Integrate climate change into each hazard.</li> <li>• Format Issue: Dams need to be either stand-alone HHPD or part of Flood hazard (current plan has dams under the Flood hazard)</li> <li>• Salem is responsible for reviewing and updating the Hazardous Materials section if they want to keep it in the plan.</li> </ul>

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<p><b>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)(iii))</b></p> <p><b>B2-a.</b> The plan must describe the vulnerability of each participant to the identified hazards. The description must include current and future assets (including people) and the risk that makes them susceptible to damage from the identified hazards.</p> <p>For plan updates, the risk assessment must meet element E1-a. The risk assessment must describe the vulnerability of plan participant(s) to each identified hazard. The vulnerability description must include a summary (such as a problem statement) of the hazard and its consequences or effects on the participant(s) and their assets. A list of assets without context is not sufficient.</p> <p><b>B2-b.</b> The plan must describe the potential impacts on each participating jurisdiction and its identified assets.</p> <p>Impacts must include the effects of climate change, changes in population patterns (migration, density, or the makeup of socially vulnerable populations), and changes in land use and development.</p> <p><b>B2-c.</b> The plan must address repetitively flooded NFIP-insured structures by including the estimated numbers and types (residential, commercial, institutional, etc.) of repetitive/severe repetitive loss properties.</p>	<p><b>VULNERABILITY ASSESSMENT</b></p> <p>Emphasis placed on the following <i>current and future</i> assets:</p> <ul style="list-style-type: none"> <li>• <u>People</u>. Underserved communities and socially vulnerable populations</li> <li>• <u>Structures</u>. Facilities, lifelines, and critical infrastructure</li> <li>• <u>Systems</u>. Networks and capabilities</li> <li>• <u>Other Resources</u>. Natural, historic, cultural resources</li> <li>• <u>Activities</u>. Community valued activities</li> </ul> <p>The vulnerability assessment must include problem statements describing the potential hazard and its consequences or effects on the assets.</p> <p>The risk assessment must meet Element E-1 (changes in development).</p>	<p>✓ No comments provided</p>	<p>✓ While repetitive loss structures are identified, no specific mitigation action is listed to address them. Consider including a strategy for addressing solutions to repetitive loss and substantial damage structures in the next update. Or explicitly state if the buyout of the Minto-Brown Island park was a part of a larger flood reduction mitigation strategy.</p>	<ul style="list-style-type: none"> <li>• The plan shall summarize the vulnerabilities and the impacts from the natural hazards and shall include: <ul style="list-style-type: none"> <li>○ <u>Description</u>. All vulnerabilities to the identified hazards, including current and future assets</li> <li>○ <u>Risk</u>. Potential for damage or loss created by the hazard and asset interaction (what that makes them susceptible to damage)</li> <li>○ <u>Potential Impacts</u>. Consequences or effects the hazard has on the assets.</li> <li>○ <u>NFIP-Insured</u>. Identify repetitive loss properties</li> </ul> </li> <li>• Review and update all data, including NFIP data</li> <li>• Update mitigation successes</li> <li>• Update community profile, all aspects <ul style="list-style-type: none"> <li>○ Strengthen vulnerable populations section</li> <li>○ Need to include more information of the underserved/socially vulnerable</li> </ul> </li> </ul>

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<b>ELEMENT C: MITIGATION STRATEGY</b>				
<p><b>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))</b></p> <p><b>C1-a.</b> The plan must describe how the existing authorities, policies, programs, funding and resources of each participant are available to support the mitigation strategy. This must include a discussion of the existing building codes and land use and development ordinances or regulations. Capabilities may be described in a table or narrative.</p> <p><b>C1-b.</b> The plan must describe the ability of each participant to expand on and improve the capabilities described in the plan. If the participants do not have the ability or authority to expand and/or improve their capabilities, the plan must describe this lack of ability or authority.</p>	<p>Emphasis placed on identifying the following:</p> <ul style="list-style-type: none"> <li>• Building codes</li> <li>• Land use and development ordinances and regulations</li> </ul> <p>The plan must describe the ability of each participant to expand on and improve the capabilities described in the plan. If the participants do not have the ability or authority to expand and/or improve their capabilities, the plan must describe this lack of ability or authority.</p>	<p>✓ <i>Good action that lists potential for integrating hazard data into updated Unified Development Code; and other actions that propose integrating hazard data into other planning and regulatory mechanisms.</i></p>	<p>✓ <i>While there are updates on action items that highlight efforts to integrate natural hazard data in codes, ordinance, zoning, and programs such as transferring development rights, consider providing a more robust information on the status of each. This information can help inform future action items or help identify barriers that the City is experiencing in achieving these items.</i></p>	<ul style="list-style-type: none"> <li>• The plan shall describe of existing capabilities (authorities, policies, programs, funding and resources) that are available to support the mitigation strategy <u>and</u> the ability to expand or improve said capabilities.</li> <li>• Review and strengthen with expanded information of local plans and regulations</li> <li>• Update with an CRS communities and level</li> </ul>
<p><b>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)(iii))</b></p> <p><b>C2-a.</b> The plan must describe participation in the NFIP for each participant, as applicable, in accordance with NFIP regulatory requirements. The following information must be provided for each participant.<sup>14</sup></p> <ol style="list-style-type: none"> <li>1. Adoption of NFIP minimum floodplain management criteria via local regulation.</li> <li>2. Adoption of the latest effective Flood Insurance Rate Map (FIRM), if applicable.</li> <li>3. Implementation and enforcement of local floodplain management regulations to regulate and permit development in SFHAs.</li> <li>4. Appointment of a designee or agency to implement the addressed commitments and requirements of the NFIP.</li> <li>5. Description of how participants implement the substantial improvement/substantial damage provisions of their floodplain management regulations after an event.</li> </ol>	<p>If the jurisdiction could but doesn’t participate in the NFIP, the plan must describe why not.</p>	<p>✓ No comments provided</p>	<p>✓ <i>Consider more clearly stating that the city is in good standing with the NFIP, even if this can be interpreted from a CRS Class 6 standing.</i></p>	<ul style="list-style-type: none"> <li>• Need to update NFIP data, if applicable</li> </ul>
<p><b>C3. Does the plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement 44 CFR § 201.6(c)(3)(i))</b></p> <p><b>C3-a.</b> The plan must include goals to reduce the risk of the identified hazards. The goals must be consistent with the hazards identified in the plan. Goals may be presented as general statements applying to more than one hazard, or they may be itemized to each of the identified hazards.</p>	<p>No substantial change</p>	<p>✓ No comments provided</p>	<p>✓ Consider illustrating a stronger connection between the results of the public outreach survey and mitigation strategies that address public concerns or perceptions.</p>	<ul style="list-style-type: none"> <li>• The plan shall include goals that are consistent with hazards identified in plan</li> <li>• Review and update existing goals</li> <li>• Tie goals to risk assessment findings</li> <li>• Tie goals to mitigation actions</li> <li>• Include goals that address underserved communities and socially vulnerable populations</li> <li>• Make sure there are mitigation actions that might address infrastructure vulnerabilities</li> </ul>



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<p><b>C4. Does the plan identify and analyze a comprehensive range of specific mitigation actions and projects for each jurisdiction being considered to reduce the effects of hazards, with emphasis on new and existing buildings and infrastructure? (Requirement 44 CFR § 201.6(c)(3)(ii))</b></p> <p><b>C4-a.</b> The mitigation strategy must include an analysis of a comprehensive range of actions or projects that the participants considered to specifically address vulnerabilities identified in the risk assessment.</p> <p><i>Actions considered must emphasize reducing risk to existing buildings, structures and infrastructure, as well as limiting risk to new development and redevelopment.</i></p> <p><b>C4-b.</b> Each plan participant must identify one or more mitigation actions the participant(s) intends to implement for each hazard addressed in the risk assessment.</p> <p><i>The actions must be achievable and demonstrate how the mitigation activities reduce the risks identified in the risk assessment.</i></p>	<p>Emphasis is placed on the following:</p> <ul style="list-style-type: none"> <li>• <u>Reducing Risk</u>. Existing buildings, structures, and infrastructure</li> <li>• <u>Limiting Risk</u>. New development and redevelopment</li> </ul> <p>New Requirements:</p> <ul style="list-style-type: none"> <li>• Considering including mitigation actions that benefit underserved communities and vulnerable populations</li> <li>• Establishing a clear link between mitigation actions and the vulnerabilities and impacts described in the risk assessment</li> <li>• Including at least one mitigation action for each hazard addressed in the risk assessment</li> <li>• Ensuring that each mitigation action listed is achievable</li> <li>• Demonstrating how mitigation activities reduce the identified risks</li> </ul>	<ul style="list-style-type: none"> <li>✓ <i>Clearly organized mitigation actions and helpful list of priority actions.</i></li> <li>✓ <i>Good actions that support developing partnerships and collaboration, including between private-public entities.</i></li> </ul>	<ul style="list-style-type: none"> <li>✓ Consider illustrating a stronger connection between the results of the public outreach survey and mitigation strategies that address public concerns or perceptions.</li> </ul>	<ul style="list-style-type: none"> <li>• The plan shall identify and analyze a comprehensive range of mitigation actions and projects (“alternatives analysis”).             <ol style="list-style-type: none"> <li>1. Local plans and regulations</li> <li>2. <b>Structure and infrastructure projects</b></li> <li>3. Natural systems protection</li> <li>4. Education and awareness programs                 <ul style="list-style-type: none"> <li>○ Strengthen the connection between public outreach and strategies that address public concerns and perceptions</li> </ul> </li> </ol> </li> <li>• Plan updates may validate and include previously included actions if those actions are being reconsidered for implementation to reduce the risks of identified hazards in current risk assessment.</li> <li>• All identified hazards need a mitigation action.</li> <li>• All mitigation actions need specific timelines, funding (actual or potential funding sources), and a priority level (H-M-L or numerical ranking, or other as long as it is somehow quantifiable). Current plan doesn’t show all of these things.</li> <li>• Review, revise, and update actions from 2017 NHMP (see additional comments under Element E)</li> </ul>
<p><b>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))</b></p> <p><b>C5-a.</b> The plan must describe the criteria used for prioritizing the implementation of the actions. The criteria must include an emphasis on the extent to which benefits are maximized, in relation to the associated costs of the action.</p> <p><b>C5-b.</b> The action plan must identify who is responsible for administering each action, along with the action’s potential funding sources and expected time frames for completion.</p> <p><i>The plan must provide the position, office, department or agency responsible for implementing/administrating the identified mitigation actions. Names are not required, but the plan must provide enough detail for users to determine who within the jurisdiction will implement or administer the mitigation action.</i></p>	<p>No substantial change</p>	<ul style="list-style-type: none"> <li>✓ <i>Clearly organized mitigation actions and helpful list of priority actions.</i></li> <li>✓ <i>Very detailed action items that list the rationale for actions and ideas for implementation.</i></li> </ul>	<ul style="list-style-type: none"> <li>✓ No comments provided</li> </ul>	<ul style="list-style-type: none"> <li>• The action plan shall describe how the actions will be:             <ol style="list-style-type: none"> <li>1. Prioritized</li> <li>2. Implemented</li> <li>3. Administered</li> </ol> </li> <li>• Review, revise, and add new actions from 2017 NHMP (see additional comments under Element E)</li> <li>• Prioritize actions</li> <li>• All mitigation actions need specific timelines, funding (actual or potential funding sources), and a priority level (H-M-L or numerical ranking, or other as long as it is somehow quantifiable). Current plan doesn’t show all of these things.</li> </ul>

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<b>ELEMENT D: PLAN MAINTENANCE</b>				
<b>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))</b>  <b>D1-a.</b> The plan must describe how the participant(s) will continue to seek public participation after the plan has been approved and during the plan's implementation, monitoring, and evaluation.	Element D, formerly referred to as "Plan Review, Evaluation, and Implementation (applicable to plan updates only)" has been reformatted	✓ Refer to applicable strengths noted under Element A	✓ Refer to applicable opportunities noted under Element A	<ul style="list-style-type: none"> <li>Review and update, where applicable</li> </ul>
<b>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))</b>  <b>D2-a.</b> The plan must identify how, when and by whom the plan will be tracked for implementation over its five-year cycle (monitoring). <b>D2-b.</b> The plan must identify how, when and by whom the plan will be assessed for effectiveness at achieving its stated purpose and goals (evaluating). <b>D2-c.</b> The plan must identify how, when and by whom the plan will be reviewed and revised at least once every five years (updating).	Element D has been reformatted, as noted above.	✓ Refer to applicable strengths noted under Element A	✓ Refer to applicable opportunities noted under Element A	<ul style="list-style-type: none"> <li>Review and update, where applicable</li> </ul>
<b>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))</b>  <b>D3-a.</b> The plan must describe the community's process to integrate the plan's data, information, and hazard mitigation goals and actions into other planning mechanisms. <b>D3-b.</b> The plan must identify the local planning mechanisms where hazard mitigation information/ actions may be integrated. The identified list of planning mechanisms must be applicable to the plan participant(s) and not contradict the identified capabilities. <b>D3-c.</b> A multi-jurisdictional plan must describe each participant's individual process for integrating information from the mitigation strategy into their identified planning mechanisms.	Element D has been reformatted, as noted above.	✓ Refer to applicable strengths noted for Element C	✓ Refer to applicable opportunities noted for Element C	<ul style="list-style-type: none"> <li>Identify a process through which you will integrate the information into other plans and codes, as appropriate</li> <li>Check that integration with other planning mechanisms is consistent with the capability assessment.</li> </ul>

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<b>ELEMENT E: PLAN UPDATE</b>				
<p><b>E1. Was the plan revised to reflect changes in development? (Requirement 44 CFR § 201.6(d)(3))</b></p> <p><b>E1-a.</b> The plan must describe changes in development that have occurred in hazard-prone areas and how they have increased or decreased the vulnerability of each jurisdiction since the previous plan was approved. If no development changes affected the jurisdiction’s overall vulnerability, this must be stated with the plan.</p>	<p>Element E, formerly referred to as “Plan Adoption” has been reformatted.</p> <p>Note the broad definition of “changes in development.” Changes in development may include the following:</p> <ol style="list-style-type: none"> <li>1. Recent development</li> <li>2. Potential development</li> <li>3. Conditions that may affect the risks and vulnerabilities (e.g., climate change, declining or increasing populations, or foreclosures)</li> <li>4. Shifts in the needs of underserved communities (NEW)</li> <li>5. Gaps in social equity (NEW)</li> <li>6. Changes in local policies, codes, standards, regulations, land use ordinances, and other conditions</li> </ol>	<p>✓ <i>Good description of how the community is changing economically, demographically, socially, and politically in the community profile.</i></p>	<p>✓ <i>The Community Profile section contains a lot of good, summary information about how Salem is developing. However, for the next update consider making a stronger connection to specifically where development, or how changes in expected economic growth, industries, or demographics, may occur in high hazard areas and the associated change in risk.</i></p>	<ul style="list-style-type: none"> <li>• We need to make sure we are considering and updating changes in the following: <ol style="list-style-type: none"> <li>1. Population (patterns with migration, density, or the makeup of socially vulnerable populations)</li> <li>2. Land use</li> <li>3. Development</li> </ol> </li> </ul>
<p><b>E2. Was the plan revised to reflect changes in priorities and progress in local mitigation efforts? (Requirement 44 CFR § 201.6(d)(3))</b></p> <p><b>E2-a.</b> The plan must describe how it was revised due to a change in priorities for each jurisdiction. This can be done as a narrative or with detailed statements in the appropriate sections of the plan. The priorities to be considered are defined by the participant(s). If the participant(s) has no change in priorities since the last approval of the mitigation plan, this must be stated.</p> <p><b>E2-b.</b> The plan must describe the status of all hazard mitigation actions in the previous plan by identifying whether they have been completed or not, for each jurisdiction. For actions that are not complete, the plan must state whether the action is no longer relevant or will be included in the updated action plan.</p> <p><b>E2-c.</b> The updated plan must explain how the jurisdiction(s) integrated information from the mitigation plan into other planning mechanisms, as a demonstration of progress in local hazard mitigation efforts. If information from the previous plan was not integrated into other planning mechanisms, this must be stated.</p>	<p>Element E has been reformatted, as noted above.</p> <p>NEW: The updated plan must explain how the jurisdiction(s) integrated information from the mitigation plan into other planning mechanisms, as a demonstration of progress in local hazard mitigation efforts. If information from the previous plan was not integrated into other planning mechanisms, this must be stated.</p>	<p>✓ No comments provided</p>	<p>✓ No comments provided</p>	<ul style="list-style-type: none"> <li>• We need to update this to reflect changes in priorities and based on results of risk assessment. Tie this to the mitigation status table.</li> <li>• Identify mitigation successes in capability assessment section.</li> <li>• We need to review, revise, and update this section (table format) to reflect progress in local mitigation efforts with Completed/Done, Progressing, Removed. If “progressing,” include a note about what’s going on with it, if possible. If “removed” state why (change in priorities, replaced by a different action, no longer needed for some reason)</li> <li>• Identify a process through which the city will integrate the information into other city plans and codes, as appropriate.</li> </ul>



REGULATION CHECKLIST	What’s New? <sup>1</sup>	2017 Plan Strengths	2017 Opportunities for Improvement	DLCD Suggestions & Assignments
ELEMENT F: PLAN ADOPTION				
<p><b>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))</b></p> <p><b>F1-a.</b> <i>The jurisdiction must provide documentation of plan adoption, usually a resolution by the governing body or other authority, to receive approval.</i></p> <p><i>Documentation may be provided in the form of meeting minutes, resolutions, signed letter or any other method to demonstrate that official adoption by the participant has occurred.</i></p>	Element F has been reformatted. Element E was formerly known as “Plan Adoption” but changed to “Plan Update”.	✓ No comments provided	✓ No comments provided	<ul style="list-style-type: none"><li>No action needed until later in the process</li></ul>
<p><b>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))</b></p> <p><b>F2-a.</b> <i>To receive approval, the participants must adopt the plan and provide documentation that the adoption has occurred.</i></p> <p><i>Participants that submit their adoption documentation separately from the other multi-jurisdictional plan participants will not receive a new expiration date.</i></p> <p><i>Participating jurisdictions that adopt the plan more than one year after Approvable Pending Adoption (APA) status has been issued must either:</i></p> <ul style="list-style-type: none"><li><i>Validate that their information in the plan remains current with respect to both the risk assessment (no recent hazard events, no changes in development) and their mitigation strategy (no changes necessary); or</i></li><li><i>Make the necessary updates before submitting the adoption resolution to FEMA.</i></li></ul>	No substantial change	✓ N/A	✓ N/A	This section is not applicable to City of Salem

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<b>ELEMENT G: HIGH HAZARD POTENTIAL DAMS (HHPD)</b>				
<p><b>HHPD1. Did the plan describe the incorporation of existing plans, studies, reports and technical information for HHPDs?</b></p> <p><i>To meet this requirement with a specific focus on HHPDs, the mitigation plan must include descriptions of:</i></p> <p><b>HHPD1-a:</b> How the local government coordinated with local dam owners and/or the state dam safety agency.</p> <p><i>NOTE: Ensure sensitive and/or personally identifiable information is protected.</i></p> <p><b>HHPD1-b:</b> Information shared by the state and/or local dam owners. Examples may include:</p> <ul style="list-style-type: none"> <li>• Location and size of the population at risk, as well as potential impacts to institutions and critical infrastructure/facilities/lifelines.</li> <li>• Inundation maps, emergency action plans, floodplain management plans and/or data or summaries provided by dam breach modeling software, such as HEC-RAS, DSS-WISE HCOM, DSS-WISE Lite, FLO-2D, as well as more detailed studies.</li> </ul>	<p><b>COMPLETELY NEW</b></p> <p>Element G was added with specific focus on HHPD. The emphasis is placed on requiring HHPD as a stand-alone hazard to be eligible for HHPD grant program.</p>	<p>✓ Refer to applicable strengths noted for all Elements</p>	<p>✓ Refer to applicable opportunities noted for all Elements</p>	<ul style="list-style-type: none"> <li>• At a minimum, local mitigation plans must address the subset of state-regulated dams considered HHPDs.</li> <li>• It is encouraged to coordinate with the dam owner and the state dam safety office to determine any issues/risks associated with identified dams. This information shall be included in the plan.</li> <li>• Format Issue: Dams need to be either stand-alone HHPD or part of Flood hazard</li> </ul>
<p><b>HHPD2. Did the plan address HHPDs in the risk assessment?</b></p> <p><i>To meet this requirement with a specific focus on HHPDs, the mitigation plan must:</i></p> <p><b>HHPD2-a:</b> Describe the risks and vulnerabilities to and from HHPDs, including:</p> <ul style="list-style-type: none"> <li>• Potential cascading impacts of storms, seismic events, landslides, wildfires, etc. on dams that might affect upstream and downstream flooding potential.</li> <li>• Potential significant economic, environmental or social impacts, as well as multi-jurisdictional impacts, from a dam incident.</li> <li>• Location and size of populations at risk from HHPDs, as well as potential impacts to institutions and critical infrastructure/facilities/lifelines.</li> <li>• Methodology and/or assumptions for risk data and inundation modeling.</li> </ul> <p><b>HHPD2-b:</b> Document the limitations and describe the approach for addressing deficiencies.</p>				

REGULATION CHECKLIST	What’s New? <sup>1</sup>	2017 Plan Strengths	2017 Opportunities for Improvement	DLCD Suggestions & Assignments
<p><b>HHPD3. Did the plan include mitigation goals to reduce long-term vulnerabilities from HHPDs?</b></p> <p><i>To meet this requirement with a specific focus on HHPDs, the mitigation plan must:</i></p> <p><b>HHPD3-a:</b> Address a reduction in vulnerabilities to and from HHPDs as part of its own goals or with other long-term strategies. The plan does not need to include a goal specific to HHPDs alone.</p> <p><b>HHPD3-b:</b> Link proposed actions to reducing long-term vulnerabilities consistent with the goals.</p>				
<p><b>HHPD4-a. Did the plan include actions that address HHPDs and prioritize mitigation actions to reduce vulnerabilities from HHPDs?</b></p> <p><i>To meet this requirement with a specific focus on HHPDs, the mitigation plan must:</i></p> <p><b>HHPD4-a:</b> Describe a range of specific actions, such as:</p> <ul style="list-style-type: none"><li>• Rehabilitating/removing dams.</li><li>• Adopting and enforcing land use ordinances in inundation zones.</li><li>• Elevating structures in inundation zones.</li><li>• Adding flood protection, such as berms, floodwalls or floodproofing, in inundation zones.</li></ul> <p><b>HHPD4-b:</b> Describe the criteria used for prioritizing actions related to HHPDs.</p> <p><b>HHPD4-c:</b> Identify the position, office, department or agency responsible for implementing and administering the action related to mitigating hazards to or from HHPDs.</p>				
<b>ELEMENT H: ADDITIONAL STATE REQUIREMENTS (Optional)</b>				
NONE AT THIS TIME				