

Standard State Hazard Mitigation Plan Review and Approval Status

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FEMA Requirements:		
FEMA Reviewer: Carol Poulin	Title: Community Planner	Date: 8/26/10
FEMA Reviewer: Cathy Mallard	Title: IRC Plan Reviewer	Date: 8/30/10
FEMA Reviewer: Jolene Hynes	Title: IRC Plan Reviewer	Date: 8/30/10
FEMA Reviewer: Todd Tucker	Title: Community Planner	Date: 8/31/10
FEMA QA/QC: Joe Chandler	Title: Senior Community Planner	Date: 8/31/10
Date Received in FEMA Region VII	August 25, 2010	
Plan Not Approved		
Plan Approved	August 31, 2010	
Date Approved	September 18, 2010	

STANDARD STATE HAZARD MITIGATION PLAN SUMMARY CROSSWALK

The plan cannot be approved if the plan has not been formally adopted.

Each requirement includes separate elements. All elements of the requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a score of "Satisfactory." Elements of each requirement are listed on the following pages of the Plan Review Crosswalk. A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing. Reviewer's comments must be provided for requirements receiving a "Needs Improvement" score.

SCORING SYSTEM

Please check one of the following for each requirement.

N – Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

S – Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Prerequisite	NOT MET	MET
Adoption by the State: §201.4(c)(6) and §201.4(c)(7)		X

Planning Process	N	S
Documentation of the Planning Process: §201.4(c)(1)		X
Coordination Among Agencies: §201.4(b)		X
Program Integration: §201.4(b)		X

Risk Assessment	N	S
Identifying Hazards: §201.4(c)(2)(i)		X
Profiling Hazards: §201.4(c)(2)(i)		X
Assessing Vulnerability by Jurisdiction: §201.4(c)(2)(ii)		X
Assessing Vulnerability of State Facilities: §201.4(c)(2)(ii)		X
Estimating Potential Losses by Jurisdiction: §201.4(c)(2)(iii)		X
Estimating Potential Losses of State Facilities: §201.4(c)(2)(iii)		X

Mitigation Strategy

- Hazard Mitigation Goals: §201.4(c)(3)(i)
- State Capability Assessment: §201.4(c)(3)(ii)
- Local Capability Assessment: §201.4(c)(3)(ii)
- Mitigation Actions: §201.4(c)(3)(iii)
- Funding Sources: §201.4(c)(3)(iv)

	N	S
Hazard Mitigation Goals: §201.4(c)(3)(i)		X
State Capability Assessment: §201.4(c)(3)(ii)		X
Local Capability Assessment: §201.4(c)(3)(ii)		X
Mitigation Actions: §201.4(c)(3)(iii)		X
Funding Sources: §201.4(c)(3)(iv)		X

Coordination of Local Mitigation Planning

- Local Funding and Technical Assistance: §201.4(c)(4)(i)
- Local Plan Integration: §201.4(c)(4)(ii)
- Prioritizing Local Assistance: §201.4(c)(4)(iii)

	N	S
Local Funding and Technical Assistance: §201.4(c)(4)(i)		X
Local Plan Integration: §201.4(c)(4)(ii)		X
Prioritizing Local Assistance: §201.4(c)(4)(iii)		X

Plan Maintenance Process

- Monitoring, Evaluating, and Updating the Plan: §201.4(c)(5)(i)
- Monitoring Progress of Mitigation Activities: §201.4(c)(5)(ii) and (iii)

	N	S
Monitoring, Evaluating, and Updating the Plan: §201.4(c)(5)(i)		X
Monitoring Progress of Mitigation Activities: §201.4(c)(5)(ii) and (iii)		X

Severe Repetitive Loss Mitigation Strategy (only required for 90/10 under FMA & SRL)

- Repetitive Loss Mitigation Strategy: §201.4(c)(3)(v)
- Coordination with Repetitive Loss Jurisdictions: §201.4(c)(3)(v)

	N	S
Repetitive Loss Mitigation Strategy: §201.4(c)(3)(v)		X
Coordination with Repetitive Loss Jurisdictions: §201.4(c)(3)(v)		X

STANDARD STATE HAZARD MITIGATION PLAN APPROVAL STATUS

PLAN NOT APPROVED	
ED pending adoption	X

See Reviewer's Comments: See also attached.

PREREQUISITE

Adoption by the State

Requirement §201.4(c)(6): The plan **must** be formally adopted by the State prior to submittal to [FEMA] for final review and approval.

Requirement §201.4(c)(7): The plan **must** include assurances that the State will comply with all applicable Federal statutes and regulations in effect with respect to the periods for which it receives grant funding, in compliance with 44 CFR 13.11(c). The State will amend its plan whenever necessary to reflect changes in State or Federal laws and statutes as required in 44 CFR 13.11(d).

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Has the State formally adopted the new or updated plan?	Section 1.1 Page 83 - 84, Annex 1.2	The plan includes sufficient information to satisfy the requirements of this element. This plan has been adopted by the State (see pdf page 84). Signed letter effective September 17, 2010. -Adoption letter included with final submission		X
B. Does the plan provide assurances that the State will continue to comply with all applicable Federal statutes and regulations during the periods for which it receives grant funding, in compliance with 44 CFR 13.11(c), and will amend its plan whenever necessary to reflect changes in State or Federal laws and statutes as required in 44 CFR 13.11(d)?	Section 1.1, Prerequisite, page 83.	The plan includes sufficient information to meet the requirements of this element. Recommended Revision: Prerequisite, Page 1 of 1, If necessary, EO 62 should be replaced with the current executive order. Consider adding a provision regarding longevity (e.g. add to section IV the words "continue to" before "participate").		X
SUMMARY SCORE				X

PLANNING PROCESS: §201.4(b): An effective planning process is essential in developing and maintaining a good plan.

Documentation of the Planning Process

Requirement §201.4(c)(1): [The State plan **must** include a] description of the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how other agencies participated.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan provide a narrative description of how the new or updated plan was prepared?	Executive Summary, pages 6-7; Section 1.2, Planning Process, pages 86 – 101, Annex 1.2-C	<p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>Recommended Revision:</p> <ul style="list-style-type: none"> • REC Annex: The REC annex should include a summary of changes from the past three years. The summary should also discuss how the REC's participated in the 2010 Iowa Plan update and changes from the 2007 plan. • The REC Annex should also discuss funding opportunities and include a discussion of how 406 mitigation can be incorporated in to the process. • The REC Annex on (p 21 of 30) references Exhibit A. However, Exhibit A was omitted from the Plan. • Reference fixed <p>Required revision at the next plan update:</p> <ul style="list-style-type: none"> • The updated plan should address how the make-up of the SHMT changed from the previous plan update. • Section 1.2, (p 10 of 15) should mention the Severe Repetitive Loss, and Repetitive Flood Claims programs. These programs should be included in the other sections of the plan as appropriate (section seems to just repeat 2007 without updating to 2010) • The Plan should indicate when and for how long it was available for public comments, and state what public comment was received and how this was integrated into Plan development. 		X
B. Does the new or updated plan indicate who was involved in the current planning process?	Section 1.2, Planning Process, pages 86 – 88, 92-94, 101, 106	<p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>Recommended revision at the next plan update:</p> <ul style="list-style-type: none"> • Identify primary, secondary, and local State Hazard 		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: September 2010
Plan Submittal Date: August 24, 2010

		<p>Mitigation Team (SHMT) members in Annex 1.2-B.</p> <ul style="list-style-type: none"> • Include a discussion about how RECs participated in the current Mitigation Plan update process. 		
<p>C. Does the new or updated plan indicate how other agencies participated in the current planning process?</p>	<p>Planning Process (§ 1.2) p 7 (pdf page 89 - 92)</p>	<p>The plan includes sufficient information to meet the requirements of this element.</p> <p>The plan states that minutes, agendas, sign-in sheets, and handout materials are available, but are not included in the plan.</p> <p>Recommended revision at the next plan update: The plan must provide more detail on how the plan update was prepared and how other agencies were involved. Provide copies of the agendas, sign-in sheets and handout materials for all meetings and workshops as an appendix to the plan. See Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000 (January 2008), page 1-5 thru 1-6.</p>		<p>X</p>
<p>D. Does the updated plan document how the planning team reviewed and analyzed each section of the plan?</p>	<p>Plan Update Revision Table, pages 3-5; Section 1.2, Planning Process, pages 89 – 92; Risk Assessment, Section 1.3, pages 138, 142, 204, 205, 206, 209, 212, 214; Mitigation Strategy, Section 1.4, pages 234,242, 243, 247 – 252, 256 – 257, 267; Mitigation Measures (Actions) Annex 1.4A, pages 268 – 273; Local Coordination,</p>	<p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>The plan should provide more information about how the SHMT determined which sections of the plan were in need of updating.</p> <p>Recommended revision at the next plan update: Provide a discussion indicating how and why it was determined that these particular hazards should be added, and a description of the process that was used to review and analyze each section of the plan. If the SHMT found that some sections of the plan warrant an update and others do not, include the process that the SHMT undertook to make that determination. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-5 thru 1-6.</p>		<p>X</p>

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	Section 1.5, page 364 – 367, 370			
E. Does the updated plan indicate for each section whether or not it was revised as part of the update process?	Plan Update Revision Table, pages 3-5; Section 1.2, Planning Process, pages 6, 89 – 92; Risk Assessment, Section 1.3, pages 138, 142, 204, 205, 206, 209, 212, 214; Mitigation Strategy, Section 1.4, pages 234 - 235, 242, 243-244, 247 – 252, 256 – 257, 267; Mitigation Measures (Actions) Annex 1.4A, pages 268 – 273; Local Coordination, Section 1.5, page 364 – 367, 370	The plan includes sufficient information to satisfy the requirements of this element. See also recommendation noted in Element D above.		X
SUMMARY SCORE				X

Coordination Among Agencies

Requirement §201.4(b): *The [State] mitigation planning process **should** include coordination with other State agencies, appropriate Federal agencies, interested groups, and*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe how Federal and State agencies were involved in the current planning process?	Section 1.2, Planning Process, pages 86 - 106	Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing. The plan includes sufficient information to satisfy the		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

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		<p>requirements of this element.</p> <p>The plan lists participants and provides general information about who is involved (i.e. State agencies) with limited discussion about how other agencies were involved (e.g. Federal agencies). The plan should describe how the State interacted with all levels of government. It should also describe how coordination among agencies changed since approval of the previous plan.</p> <p>Recommended revision for the next plan update: The plan <i>should</i> provide greater detail in describing how the State interacted with Federal, State, regional, local agencies, and nonprofit organizations in the development of the plan. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-7 thru 1-10.</p>		
<p>B. Does the new or updated plan describe how interested groups (e.g., businesses, non-profit organizations, and other interested parties) were involved in the planning process?</p>	<p>Section 1.2, Planning Process, pages 88, 91, 99, 108,207</p>	<p>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</p> <p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>See element A above.</p>		<p>X</p>
<p>C. Does the updated plan discuss how coordination among Federal and State agencies changed over the past three years?</p>	<p>Planning Process (§ 1.2),</p>	<p>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</p> <p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>See element A above.</p>		<p>X</p>
<p>SUMMARY SCORE</p>				<p>X</p>

Program Integration

Requirement §201.4(b): [The State mitigation planning process *should*] be integrated to the extent possible with other ongoing State planning efforts as well as other FEMA mitigation programs and initiatives.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe how the State mitigation planning process is integrated with other new or ongoing State planning efforts?	Section 1.2, Planning Process, pages 95-97; Section 1.4, Mitigation Strategy, pages 256 – 262; Annex 1.4-B, pages 282 – 308; Section 1.5, Local Coordination, page 371	Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing. The plan includes sufficient information to satisfy the requirements of this element. Recommended revision at the next plan update: The plan should expand on section 3.2.1 to clarify what, (if any) gaps were found and how they were addressed in integrating the Emergency Plan and other State Planning efforts with the Mitigation Plan. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-7 thru 1-10.		X
B. Does the new or updated plan describe how the State mitigation planning process is integrated with FEMA mitigation programs and initiatives?	Executive Summary, pages 6-7; Section 1.2, Planning Process, pages 89 – 91, 93, 94-95, 98-99; Section 1.4, Mitigation Strategy, pages 253 – 255; Annex 1.4-A, pages 268 – 273; Annex 1.4-B, pages 274 – 276; Section 1.5, Local	Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing. The plan includes sufficient information to satisfy the requirements of this element.		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

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	Coordination, pages 363 – 369, 371 - 376			
C. Does the updated plan describe any obstacles to integration efforts, if any?	Section 1.2, Planning Process, pages 95-96	<p>Note: A “Needs Improvement” score on this requirement will not preclude the plan from passing.</p> <p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>Recommended Revision at the next plan update: The plan should discuss State Planning Integration efforts and opportunities that were identified in the previously approved plan, and any unforeseen obstacles that emerged since approval of the previous plan. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-11 thru 1-14.</p>		X
SUMMARY SCORE				X

RISK ASSESSMENT: §201.4(c)(2): *[The State plan must include a risk assessment] that provides the factual basis for activities proposed in the strategy portion of the mitigation plan. Statewide risk assessments must characterize and analyze natural hazards and risks to provide a statewide overview. This overview will allow the State to compare potential losses throughout the State and to determine their priorities for implementing mitigation measures under the strategy, and to prioritize jurisdictions for receiving technical and financial support in developing more detailed local risk and vulnerability assessments.*

Identifying Hazards

Requirement §201.4(c)(2)(i): *[The State risk assessment shall include an] overview of the type ... of all natural hazards that can affect the State*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan provide a description of the type of all natural hazards that can affect the State? If the hazard identification omits (without explanation) any hazards commonly recognized as threats to the State, this part of the plan cannot receive a Satisfactory score.	Executive Summary Planning Process (§ 1.2) Risk Assessment (§ 1.3) p 2 -68	<p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>Recommended Revision:</p> <ul style="list-style-type: none"> Clarify and identify the three hazards that are discussed in the Planning Process, Section 1.2, (p 7 of 15). Reference was fixed Risk Assessment, Section 1.3, page 5 of 118, 4th paragraph: The Plan discusses all of the consolidated hazards except Infrastructure Failure. However, the hazard is listed on the 		X

		<p>Consolidated Hazard Chart (below the narrative).</p> <ul style="list-style-type: none"> Section was fixed <p>Recommended Revision at the next Plan Update:</p> <ul style="list-style-type: none"> Dams exist outside of the state that may have an adverse impact on the State's population, economy, and resources, if failure were to occur. Examine the hazard mitigation plans to indentify dams or other hazards that may affect the state for consideration in the 2013 Plan. When the hazard summaries include a word description such as likely / unlikely; high, medium, low; or very small / very large, etc., a description of this qualification needs to be provided for context. See Landslide (very small / large),-Human Disease (Highly Infectious), etc. Label all graphics, figures, and tables sequentially (e.g. Table 2.13A, Figure 2.13A, etc.) <p>Guidance: §201.4(c)(2) of the Rule requires that States undertake a Risk assessment that provides the factual basis for developing a mitigation strategy. The provision encourages States to produce a meaningful analysis of the hazards and vulnerabilities that affect them. Errors, omissions, unclear, or incomplete information undermines the State's effort to develop and implement an effective mitigation plan. This section <i>should</i> include a description of how the State collected the information to identify these hazards, including sources of information. The process <i>should</i> also include incorporation of the results from local level mitigation planning efforts to identify hazards as that information becomes available.</p> <p>Where trends can be perceived, such as when examining the GIS maps for Windstorm, Annual Flood loss, Drought, etc., and when examining local plans, additional consideration and analysis should be provided to determine if the local jurisdictions within the frequency variations are at greater risk (based on the factual data and as mapped). If so, what should be done to mitigate for that risk on a regional or localized basis. This should also occur where intuitive correlations do not seem to be validated, such as extreme heat and drought, or the perceived lack of correlation between sinkhole formations and coal mine locations. In this instance a discussion of risks posed from geology (karst formation) and underground mining (subsidence) should be</p>	
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FEMA REGION VII

State: Iowa

Date of Plan: September 2010
Plan Submittal Date: August 24, 2010

		<p>included, and differentiate between sinkhole formation and mining subsidence). This may also correlate to population growth, building practices, or other trends that can only be identified with further analysis.</p> <p>Where the previously approved plan identifies data deficiencies that would be addressed at a later time, then FEMA would expect the new information to be incorporated into the update risk assessment. However, if data deficiencies have not been resolved, they must be addressed in the updated plan, accompanied by an explanation of why they remain, and an updated schedule provided to resolve the issue.</p> <p>Required Revision at the next Plan Update: The plan must address any newly identified hazards or hazards that have been determined to pose a more significant threat than was apparent when the previously approved plan was prepared. If improved descriptions of hazards identified in the previous plan are available, or trends identified, they must be incorporated into this section, to produce a meaningful analysis of the hazards and vulnerabilities that affect the State and local jurisdictions. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-14 thru 1-17.</p>		
SUMMARY SCORE				X

Profiling Hazards

Requirement §201.4(c)(2)(i): [The State risk assessment shall include an overview of the] location of all natural hazards that can affect the State, including information on previous occurrences of hazard events, as well as the probability of future hazard events, using maps where appropriate

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
<p>A. Does the risk assessment identify the location (i.e., geographic area affected) of each natural hazards addressed in the new or updated plan?</p>	<p>Community Profile, pages 11-35, 49-82; Section 1.2, Planning Process, page 90; Section 1.3, Risk Assessment,</p>	<p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>Section 1.3, Earthquake should include the HAZUS MH annualized loss info (see guidance),</p> <p>Guidance: The plan should describe the geographic boundaries in the State that would be affected by the hazards. For those hazards that are not geographically determined, plans should indicate their probable intensity.</p>		X

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FEMA REGION VII

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	pages 147-201	<p>For example, for areas where tornadoes occur, plans should indicate the recorded intensities of previous events. See also discussion noted in Element §201.4(c)(2)(i)A above.</p> <p>Where data limitations exist, and information is not available, the plan should indicate a lack of data to accomplish the requirement and include a Mitigation Strategy that provides for the development of this data during the next plan update.</p> <p>The plan update must continue to include occurrences of hazards profiled in the previous plan, and discuss new occurrences of hazard events. The updated plan should incorporate any new studies or technical information related to profiling hazards, such as new National Flood Insurance Program maps, studies, HAZUS studies, or reports from other Federal or State agencies that relate to the location of natural hazards, past hazard events and probability of future hazard events. See Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000 (January 2008), page 1-18 thru 1-22.</p>		
<p>B. Does the plan provide information on previous occurrences of each hazard addressed in the new or updated plan?</p>	Annex 1.3A (pdf Page	<p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>Recommended Revision The plan omits, or does not provide current information for historical occurrences of various hazards: animal/crop disease, grass/wildland fire, hazardous materials, infrastructure failure, sinkhole, etc. Where previous occurrences are noted, they are provided in general terms.</p> <p>Where data limitations exist, and information is not available, the plan should indicate a lack of data to accomplish the requirement and include a Mitigation Strategy that provides for the development of this data during the next plan update.</p> <p>Required Revision at the next Plan Update: Ensure that the data is current, clear, accurate, and consistent in presentation within hazards and between hazards (numerical quantity, percent, etc.).</p>		X
<p>C. Does the new or updated plan include the probability of future events (i.e., chance of occurrence) for each hazard addressed in the plan?</p>	Risk Assessment, pages 143, 147-204	<p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>Section 1.3, Probability (p 8 of 118). The formula (Probability x .45) of the Risk Assessment (§1.3) should describe how the</p>		X

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		<p>committee arrived at the weighted numerical values.</p> <ul style="list-style-type: none"> Use of consistent terms would help clarify the meaning (e.g. (p 8 of 118) qualifies probability with a score of 1 - 4 and a value description of Unlikely – Highly Likely; however the probability description for the hazard uses terms such as “low probability” leading to confusion. <p>Where data limitations exist, and information is not available, the plan must indicate a lack of data to accomplish the requirement and include a Mitigation Strategy that provides for the development of this data during the next plan update.</p> <p>Recommended Revision at the next Plan Update: The plan must include information on the probability of future hazard events. In addition, it should describe the analysis or sources used to determine the probability and their magnitudes. The plan <i>should</i> also describe the analysis and sources used to determine probability and magnitude of future hazard events. Additional information is needed describing how the SHMT arrived at the weighted numerical value. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-18 thru 1-22.</p>		
<p>D. If maps are included in the updated plan, are they consistent with the updated information?</p>	<p>Community Profile, pages 11-35, 49-82; Section 1.3, Risk Assessment, pages 147-201</p>	<p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>Recommended revision prior to adoption by the State:</p> <ul style="list-style-type: none"> Risk Assessment, Drought map. Clarify the conflicting data between the text, table, and map. Data was further clarified to note that the map indicates regional events by county, not the total of 20 drought periods for the entire state <p>Guidance: While maps are not required, any maps included in the plan must be consistent with the information. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-18 thru 1-22.</p> <p>All maps should include the relevant data such as county name, a scale bar, legend, north arrow, creation / revision date, and source information. All maps should include this</p>		<p>X</p>

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		information in the next plan update.		
SUMMARY SCORE				X

Assessing Vulnerability

Requirement §201.4(c)(2)(ii): [The State risk assessment **shall** include an] overview and analysis of the State’s vulnerability to the hazards described in this paragraph (c)(2), based on estimates provided in local risk assessments as well as the State risk assessment. The State **shall** describe vulnerability in terms of the jurisdictions most threatened by the identified hazards, and most vulnerable to damage and loss associated with hazard events. State owned critical or operated facilities located in the identified hazard areas shall also be addressed ...

Requirement §201.4(d): Plan must be reviewed and revised to reflect changes in development...

Assessing Vulnerability by Jurisdiction

Element	Location in the Plan (section or annex and page #)	Reviewer’s Comments	SCORE	
			N	S
A. Does the new or updated plan describe the State’s vulnerability based on estimates provided in local risk assessments as well as the State risk assessment?	Executive Summary, pages 6-7; Section 1.2, Planning Process, pages 86, 88-92, 95, 97-99 Section 1.3, Risk Assessment, pages 138-201, 204-208; Annex 1.4-C, Local Hazard Mitigation Plan Collection Sheets, pages 310-356	The plan includes sufficient information to satisfy the requirements of this element. The plan states that it is reviewing its current system to integrate local hazard analysis and risk assessment process into the State Mitigation Plan. See also §201.4(c)(2)(i)A above. Recommended Revision: Where data limitations exist, and information is not available, the plan should include a Mitigation Strategy that provides for the development of this data during the next plan update.		X
B. Does the new or updated plan describe the State’s vulnerability in terms of the jurisdictions most threatened and most vulnerable to damage and loss associated with hazard event(s)?	Risk Assessment (§ 1.3); Iowa Map Book p 68 – 83 (pdf page pages 204 - 208;	The plan includes sufficient information to satisfy the requirements of this element.		X

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Plan Submittal Date: August 24, 2010

<p>C. Does the updated plan explain the process used to analyze the information from the local risk assessments, as necessary?</p>	<p>Executive Summary, pages 6-7; Section 1.2, Planning Process, pages 86, 88-92, 95, 97-99 Section 1.3, Risk Assessment, pages 138-229; Annex 1.4-C, Local Hazard Mitigation Plan Collection Sheets, pages 310-356</p>	<p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>Recommended revision prior to adoption by the State:</p> <p>The State uses data collection sheets to obtain data from local jurisdictions and coordinating projects.</p>		<p>X</p>
<p>D. Does the updated plan reflect changes in development for jurisdictions in hazard prone areas?</p>	<p>Community Profile; Risk Assessment (§ 1.3); Iowa Map Book p 68 – 83 (pdf page 204 - 220) Community Profile, pages 20-44; Section 1.2, Planning Process, pages 95-96</p>	<p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>The plan relies on the 2000 census data, which, in 2010, may not reflect localized changes in development trends.</p> <p>Where data limitations exist, and information is not available, the plan must indicate a lack of data to accomplish this requirement in the Hazard Analysis section and include a Mitigation Strategy that provides for the development of this data during the next plan update.</p> <p>Guidance: Recognizing that statewide vulnerability may not change much in any given three year update cycle, this section provides an opportunity to anticipate future risk. The State must consider in its assessment, for jurisdictions in hazard prone areas, changes in development that may impact vulnerability such as: population increases or shifts to vulnerable areas; concentrations or changes in land use activities in vulnerable areas; and implementation of mitigation actions that have reduced vulnerability. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-23 thru 1-26.</p> <p>Recommended Revision at the next plan update: Future plan updates should include information on development</p>		<p>X</p>

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: **September 2010**
Plan Submittal Date: **August 24, 2010**

		trends identified in local mitigation plans, statewide population growth changes, substantial new development or redevelopment, and land use data. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-23 thru 1-26.		
			SUMMARY SCORE	X

Assessing Vulnerability of State Facilities

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe the types of State owned or operated critical facilities located in the identified hazard areas?	Community Profile; Risk Assessment (§ 1.3) p 84 – 86	<p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>Risk Assessment (§1.3), page 84 of 86. The identified hazard areas consist only of flood and tornadoes and should include other applicable hazards. In addition, estimating potential loss at state critical facilities is identical between the 2007 and 2010 Plans for floodplain.</p> <p>Guidance: The update <i>should</i> also reflect acquisition or development of new properties and infrastructure. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-27 thru 1-28.</p>		X
			SUMMARY SCORE	X

Estimating Potential Losses

Requirement §201.4(c)(2)(iii): [The State risk assessment **shall** include an] overview and analysis of potential losses to the identified vulnerable structures, based on estimates provided in local risk assessments as well as the State risk assessment. The State **shall** estimate the potential dollar losses to State owned or operated buildings, infrastructure, and critical facilities located in the identified hazard areas.

Requirement §201.4(d): *Plan must be reviewed and revised to reflect changes in development...*

Estimating Potential Losses by Jurisdiction

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan present an overview and analysis of the potential losses to the identified vulnerable	Section 1.3, Risk	The plan includes sufficient information to satisfy the requirements of this element.		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: **September 2010**
Plan Submittal Date: **August 24, 2010**

structures?	Assessment, pages 209-232			
B. Are the potential losses based on estimates provided in local risk assessments as well as the State risk assessment?	Section 1.3, Risk Assessment, pages 204-232	<p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>The plan does not incorporate the findings of local jurisdiction loss estimates but rationale for failure to do so is on page 105.</p> <p>Where data limitations exist, and information is not available, the plan must indicate a lack of data to accomplish this requirement in the Hazard Analysis section and include a Mitigation Strategy that provides for the development of this data during the next plan update.</p> <p>Recommended Revision at the next plan update: The process <i>should</i> include incorporating the results of local level mitigation planning efforts to identify hazards as that information becomes available. Future plan updates should be based on information provided in local plans as well as the state risk assessment. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-29 thru 1-31.</p>		X
C. Does the updated plan reflect the effects of changes in development on loss estimates?	Section 1.3, Risk Assessment, pages 209-212	<p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>Information on changes in development is not included in the plan and data limitations are cited as the reason. This data limitation is addressed in the mitigation strategy.</p> <p>Recommended Revision: Future plan updates should include consideration of the changes in development since the plan as originally approved that may affect the statewide loss estimates. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-29 thru 1-31.</p>		X
			SUMMARY SCORE	X

Estimating Potential Losses of State Facilities

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan present an estimate of the	Section 1.3,	The plan includes sufficient information to meet the		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: **September 2010**
Plan Submittal Date: **August 24, 2010**

<p>potential dollar losses to State owned or operated buildings, infrastructure, and critical facilities in the identified hazard areas?</p>	<p>Risk Assessment, pages 204-232, Annex 1.3- A,</p>	<p>requirements of this element.</p> <p>The plan provides estimated replacement costs for state owned buildings by county in a table on pages 85 and 86.</p> <p>Guidance: The estimates should be broken down by hazard and information on state infrastructure should be provided. Future plans should also include a description of any changes in the estimated dollar losses to state owned or operated buildings, infrastructure, and critical facilities. The use of HAZUS-MH can be used to produce Risk assessment outputs for earthquakes and floods. . See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-29 thru 1-31.</p>		
<p>SUMMARY SCORE</p>				<p>X</p>

MITIGATION STRATEGY: §201.4(c)(3) [To be effective the plan must include a] Mitigation Strategy that provides the State’s blueprint for reducing the losses identified in the risk assessment.

Hazard Mitigation Goals

Requirement §201.4(c)(3)(i): [The State mitigation strategy shall include a] description of State goals to guide the selection of activities to mitigate and reduce potential losses.

Requirement §201.4(d): [The] plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts and changes in priorities...

Element	Location in the Plan (section or annex and page #)	Reviewer’s Comments	SCORE	
			N	S
<p>A. Does the new or updated plan provide a description of State mitigation goals that guide the selection of mitigation activities?</p>	<p>Mitigation Strategy (§ 1.4), Section 1.3, Risk Assessment, pages 234-241</p>	<p>The plan includes sufficient information to meet the requirements of this element.</p>		<p>X</p>
<p>B. Does the updated plan demonstrate that the goals were assessed and either remain valid or have been revised?</p>	<p>Mitigation Strategy (§ 1.4), Section 1.4, Risk Assessment, pages 234-241</p>	<p>The plan includes sufficient information to meet the requirements of this element.</p> <p>The SHMT concluded that there were no significant changes to the existing goals. However, the SHMT developed goals to reflect new and revised hazards (e.g., human disease, hazardous materials, transportation incident, infrastructure failure, radiological, public disorder and terrorism).</p>		<p>X</p>

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: **Iowa**

Date of Plan: **September 2010**
 Plan Submittal Date: **August 24, 2010**

SUMMARY SCORE		X
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State Capability Assessment

Requirement §201.4(c)(3)(ii): *[The State mitigation strategy shall include a] discussion of the State’s pre-and post-disaster hazard management policies, programs, and capabilities to mitigate the hazards in the area, including: an evaluation of State laws, regulations, policies, and programs related to hazard mitigation as well as to development in hazard-prone areas [and] a discussion of State funding capabilities for hazard mitigation projects*

Element	Location in the Plan (section or annex and page #)	Reviewer’s Comments	SCORE	
			N	S
A. Does the new or updated plan include an evaluation of the State’s pre-disaster hazard management policies, programs, and capabilities?	Mitigation Strategy (§ 1.4); Annex 1.4-A, Section 1.4, Risk Assessment, pages 256-267; Annex 1.4-A, pages 268-273; Annex 1.4-B, pages 274 - 309	The plan includes sufficient information to meet the requirements of this element. The plan includes new and updated legislation with a brief description of mitigation-related benefits. Recommended Revision at the next plan update: The plan should highlight implementation tools, policies and programs that have proven to be effective in achieving mitigation objectives (e.g. planning legislation, requiring integration of mitigation actions in comprehensive plans.). See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-39 thru 1-42.		X
B. Does the new or updated plan include an evaluation of the State’s post-disaster hazard management policies, programs, and capabilities?	Mitigation Strategy (§ 1.4); Annex 1.4-A, Section 1.4, Risk Assessment, pages 256-267; Annex 1.4-A, pages 268-273; Annex 1.4-B, pages 274 - 309	The plan includes sufficient information to meet the requirements of this element. The plan includes new and updated legislation with a brief description of mitigation-related benefits.		X
C. Does the new or updated plan include an evaluation of the State’s policies related to development in hazard prone areas ?	Mitigation Strategy Section 1.4, Risk Assessment, pages 256-267; Annex 1.4-A, pages 268 – 273; Annex 1.4-B, pages 274 - 309	The plan includes sufficient information to meet the requirements of this element. See also Element A above.		X
D. Does the new or updated plan include a discussion of State	Section 1.4, Risk	The plan includes sufficient information to meet the		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: **September 2010**
Plan Submittal Date: **August 24, 2010**

<p>funding capabilities for hazard mitigation projects?</p>	<p>Assessment, pages 256-262, 267; Annex 1.4-B, pages 274 - 309</p>	<p>requirements of this element.</p>		
<p>E. Does the updated plan address any hazard management capabilities of the State that have changed since approval of previous plan?</p>	<p>Mitigation Strategy (§ 1.4); Annex 1.4-A, Section 1.4, Risk Assessment, pages 256-257;</p>	<p>The plan includes sufficient information to meet the requirements of this element.</p> <p>The plan addresses this element. The Plan states: "The 2007 capability assessment was provided to the SHMT representative from each state agency for review and update. The updated information by agency representatives was incorporated into the 2010 Plan update." (page 256)</p> <p>Recommended Revision at the next plan update: The plan should provide additional discussion regarding how the States' capabilities have changed since approval of the previous plan.</p>		<p>X</p>
<p>SUMMARY SCORE</p>				<p>X</p>

Local Capability Assessment

Requirement §201.4(c)(3)(ii): [The State mitigation strategy *shall* include] a general description and analysis of the effectiveness of local mitigation policies, programs, and capabilities.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
<p>A. Does the new or updated plan present a general description of the local mitigation policies, programs, and capabilities?</p>	<p>Mitigation Strategy (§ 1.4), Section 1.4, Risk Assessment, pages 262-266; Annex 1.4-A, pages 268-273; Annex 1.4-B, pages 274 – 309; Annex 1.4-C, pages 310-356;</p>	<p>The plan includes sufficient information to satisfy the requirements of this element.</p> <p>Annex 1.4-C includes sample forms for reporting information contained in local mitigation plans, including policies, programs and capabilities.</p>		<p>X</p>
<p>B. Does the new or updated plan provide a general analysis of the effectiveness of local mitigation policies, programs, and capabilities?</p>	<p>Mitigation Strategy (§ 1.4), Section 1.4, Risk Assessment, pages 262-266; Annex 1.4-A, pages 268-</p>	<p>The plan includes sufficient information to meet the requirements of this element.</p> <p>Additional programs should be included in the description, such as capital improvement and economic policies, storm water management</p>		<p>X</p>

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: **September 2010**
 Plan Submittal Date: **August 24, 2010**

	273;	regulations, code enforcement programs, infrastructure expansion policies, etc. See also sub-element A above.		
				X

Mitigation Actions

Requirement §201.4(c)(3)(iii): [State plans shall include an] identification, evaluation, and prioritization of cost-effective, environmentally sound, and technically feasible mitigation actions and activities the State is considering and an explanation of how each activity contributes to the overall mitigation strategy. This section should be linked to local plans, where specific local actions and projects are identified.

Requirement §201.4(d): [The] plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts and changes in priorities...

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan identify cost-effective, environmentally sound, and technically feasible mitigation actions and activities the State is considering?	Mitigation Strategy (§ 1.4) & Annexes, Section 1.4, Mitigation Strategy, pages 244-254; Annex 1.4-A, pages 268-273;	<p>The plan includes sufficient information to meet the requirements of this element.</p> <p>The plan indicates the SHMT combined additional measures, and as a result, the number of mitigation measures was reduced from 166 to 53.</p> <p>Guidance: The updated plan must identify the complete, deleted, or deferred actions or activities from the previously approved plan as a benchmark for progress. Further, the update plan shall include in its evaluation and prioritization any new mitigation actions identified since the previous plan was approved or through the plan update process. If the mitigation actions or activities remain unchanged, the plan update must indicate why changes are not necessary. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-46 thru 1-49.</p>		X
B. Does the new or updated plan evaluate these actions and activities?	Mitigation Strategy (§ 1.4) & Annexes, Section 1.4, Mitigation Strategy, pages 244-254; Annex 1.4-A, pages 268-273;	The plan includes sufficient information to meet the requirements of this element.		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: September 2010
Plan Submittal Date: August 24, 2010

	Annex 1.4-B, pages 274-309			
C. Does the new or updated plan prioritize these actions and activities?	Mitigation Strategy (§ 1.4) & Annexes	<p>The plan includes sufficient information to meet the requirements of this element.</p> <p>The plan notes all mitigation measures received positive ratings in the Social, Technical, Administrative, Political and Legal categories. However, the plan omitted a discussion of the Environmental criteria applied to mitigation measures.</p> <p>Recommended Revision: When applying methods such as the STAPLEE in the prioritization of mitigation actions, enough information should be provided about the process and conclusions reached for the reader to follow and replicate. See also <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-46 thru 1-47.</p>		X
D. Does the new or updated plan explain how each activity contributes to the overall State mitigation strategy?	Mitigation Strategy (§ 1.4) & Annexes, Section 1.4, Mitigation Strategy, pages 247-252;	<p>The plan includes sufficient information to meet the requirements of this element.</p> <p>Recommended Revision at the next plan update: Elaborate on the table to explain how each activity contributes to the overall State Mitigation strategy.</p>		X
E. Does the updated plan identify the status (i.e. completed, deleted, or deferred) of actions or activities from the previously approved plan?	Mitigation Strategy (§ 1.4) & Annexes, Section 1.4, Mitigation Strategy, pages 247-252; Annex 1.4-A, pages 268-273	The plan includes sufficient information to meet the requirements of this element.		X
F. Does the mitigation strategy section in the new or updated plan reflect actions and projects identified in local plans?	Mitigation Strategy (§ 1.4) & Annexes Section 1.4, Mitigation Strategy, pages 242-244; Annex 1.4-C, pages 310-356; Section 1.5, Local Coordination, page 371	<p><i>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</i></p> <p>The plan includes sufficient information to meet the requirements of this element.</p> <p>Annex 1.4-C provides a Local Hazard Mitigation Plan – Data Collection Sheet.</p>		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: **September 2010**
Plan Submittal Date: **August 24, 2010**

		The plan references how the State is incorporating Local Plans, and should also identify which actions and projects are being incorporated from local plans into the State Plan.		
SUMMARY SCORE				X

Funding Sources

Requirement §201.4(c)(3)(iv): [The State mitigation strategy **shall** include an] identification of current and potential sources of Federal, State, local, or private funding to implement mitigation activities.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan identify current sources of Federal, State, local, or private funding to implement mitigation activities?	Section 1.4, Mitigation Strategy, pages 256-262, 267; Annex 1.4-B, pages 274-309	The plan includes sufficient information to meet the requirements of this element.		X
B. Does the new or updated plan identify potential sources of Federal, State, local, or private funding to implement mitigation activities?	Section 1.4, Mitigation Strategy, pages 256-262, 267; Annex 1.4-B, pages 274-309	The plan includes sufficient information to meet the requirements of this element.		X
C. Does the updated plan identify the sources of mitigation funding used to implement activities in the mitigation strategy since the previous plan was approved?	Mitigation Strategy (§ 1.4) & Annexes Annex 1.4-A, pages 268-273;	The plan includes sufficient information to meet the requirements of this element.		X
SUMMARY SCORE				X

COORDINATION OF LOCAL MITIGATION PLANNING

Local Funding and Technical Assistance

Requirement §201.4(c)(4)(i): [The section on the Coordination of Local Mitigation Planning **must** include a] description of the State process to support, through funding and technical assistance, the development of local mitigation plans.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan provide a description of the State process to support, through funding and technical assistance, the development or update of local mitigation plans?	Annex 1.4-B, pages 282-208 Annex 1.4-C, pages 310-356;	The plan includes sufficient information to meet the requirements of this element. Annex 1.4-B lists programs supporting mitigation actions.		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: **September 2010**
 Plan Submittal Date: **August 24, 2010**

	<p>Section 1.5, Local Coordination, pages 363-376; Annexes to Section 1.5</p> <p>Local Coordination (§ 1.5)</p>	<p>Annex 1.4-C includes sample reporting sheets for gathering local information</p> <p>Section 1.5 describes process for providing State support and integration of local planning.</p> <p>Recommended Revisions: Future plan updates should include:</p> <ul style="list-style-type: none"> A discussion of how the State will provide continued technical assistance to Local Hazard Mitigation Plan Authors for pre- and post-training workshops. This will facilitate or guide the Plan Authors in plan development in the areas of risk assessment, assessing vulnerability, appropriate hazard mitigation actions, integrating plan update requirements into the mitigation plan, preparing plan updates, developing multi-jurisdictional plans, as well as identifying and profiling hazards. A discussion of the steps the State has taken and will take after disaster declarations to encourage affected jurisdictions to complete or update their mitigation plans focusing on changes in vulnerability and revised priorities. <p>See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-54 thru 1-56.</p>		
<p>B. Does the updated plan describe the funding and technical assistance the State has provided in the past three years to assist local jurisdictions in completing approvable mitigation plans?</p>	<p>Local Coordination (§ 1.5), Section 1.5, Local Coordination, pages 363-376;</p>	<p>The plan includes sufficient information to meet the requirements of this element.</p>		<p>X</p>
<p>SUMMARY SCORE</p>				<p>X</p>

Local Plan Integration

Requirement §201.4(c)(4)(ii): [The section on the Coordination of Local Mitigation Planning **must** 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.

Requirement §201.4(d): [The] plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts and changes in priorities...

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan provide a description of the process and timeframe the State established to review local plans?	Local Coordination (§ 1.5), Section 1.5, Local Coordination, pages 363-376; Annexes to Section 1.5	<p>The plan includes sufficient information to meet the requirements of this element.</p> <p>The plan demonstrates good integration with FEMA mitigation programs primarily through its mitigation strategy. Noted in the plan were the safe room program and the use of 406 mitigation.</p> <p>One noted exception is the requirement in 44 CFR 201.6(d)(1) that requires local plans be submitted to the State Hazard Mitigation Officer (SHMO) for initial review and coordination. The state does not currently have the capacity or capability to review the local plans. The state should build their capacity and capability to coordinate and review local mitigation plans. A strategy to build this capacity shall be implemented by the next plan update or closure of the IRC, whichever comes first.</p> <p>Guidance: The State Plan update should identify areas where local jurisdictions utilize State Plan information (e.g. Risk Assessment data) to complete their plans, or alternatively where local plan data were integrated into the State Plan (e.g. local development trends). The State plan update should describe how the State reviewed local mitigation plans to ensure that State Goals and objectives were supportive of local strategies. The State should coordinate with locals to ensure that identified mitigation goals are coordinated so that resulting hazard mitigation projects and actions result in similar ends and compliment objectives.</p> <p>The plan should include a description, as well as a timeline, of the State's approach for reviewing, coordinating, and integrating Local Plans into the statewide mitigation plan.</p>		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: **September 2010**
Plan Submittal Date: **August 24, 2010**

		While not required by the Rule, FEMA recommends listing the offices or departments responsible for these activities. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-57.		
B. Does the new or updated plan provide a description of the process and timeframe the State established to coordinate local plans?	Local Coordination (§ 1.5), Section 1.5, Local Coordination, pages 363-376; Annexes to Section 1.5	The plan includes sufficient information to meet the requirements of this element. See Element A above.		X
C. Does the new or updated plan provide a description of the process and timeframe the State established to link local plans to the State Mitigation Plan?	Section 1.5, Local Coordination, pages 363-376	The plan includes sufficient information to meet the requirements of this element. See Element A above.		X
SUMMARY SCORE				X

Prioritizing Local Assistance

Requirement §201.4(c)(4)(iii): *[The section on the Coordination of Local Mitigation Planning **must** 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.*

*Further, that 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.*

Requirement §201.4(d): *[The] plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts and changes in priorities...*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan provide a description of the criteria for prioritizing those communities and local jurisdictions that would receive planning and project grants under available mitigation funding programs?	Local Coordination Section 1.5, Local Coordination, pages 372-376	The plan includes sufficient information to meet the requirements of this element.		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: September 2010
Plan Submittal Date: August 24, 2010

<p>B. For the new or updated plan, do the prioritization criteria include, for non-planning grants, the consideration of the extent to which benefits are maximized according to a cost benefit review of proposed projects and their associated cost?</p>	<p>Local Coordination Section 1.5, Local Coordination, pages 372-376</p>	<p>The plan includes sufficient information to meet the requirements of this element.</p>	<p>X</p>
<p>C. For the new or updated plan, do the criteria include considerations for communities with the highest risk?</p>	<p>Local Coordination (§ 1.5) Section 1.5, Local Coordination, pages 372-376</p>	<p>Note: A “Needs Improvement” score on this requirement will not preclude the plan from passing. The plan does not include sufficient information to meet the requirements of this element.</p> <p>Section 1.5 describes the process for prioritizing Local assistance, which involves two levels, 1. Voluntary cooperative agreements and; 2. Funding and programs delivered through FEMA. Prioritization considerations are provided. CFR’s are used as guidance. Process relies on federal funding criteria.</p> <p>Guidance: The criteria for selecting communities <i>should</i> include those communities that are at highest risk, have repetitive properties, or are facing intense development pressure. The description can also include how assisting communities with their mitigation projects will achieve the plan’s goals and objectives. See <i>Multi-Hazard Mitigation Planning Guidance under the Disaster Mitigation Act 2000</i> (January 2008), page 1-58 thru 1-60.</p>	<p>X</p>
<p>D. For the new or updated plan, do the criteria include considerations for repetitive loss properties?</p>	<p>Local Coordination (§ 1.5) Section 1.5, Local Coordination, pages 372-376</p>	<p>Note: A “Needs Improvement” score on this requirement will not preclude the plan from passing.</p> <p>The plan does not include sufficient information to meet the requirements of this element.</p> <p>See Element C above.</p>	<p>X</p>
<p>E. For the new or updated plan, do the criteria include considerations for communities with the most intense development pressures?</p>	<p>Local Coordination (§ 1.5) Section 1.5, Local Coordination, pages 372-376</p>	<p>Note: A “Needs Improvement” score on this requirement will not preclude the plan from passing.</p> <p>The plan does not include sufficient information to meet the requirements of this element.</p> <p>See Element C above.</p>	<p>X</p>

SUMMARY SCORE

X

PLAN MAINTENANCE PROCESS

Monitoring, Evaluating, and Updating the Plan

Requirement §201.4(c)(5)(i): [The Standard State Plan Maintenance Process **must** include an] established method and schedule for monitoring, evaluating, and updating the plan.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe the method and schedule for monitoring the plan? (e.g., identifies the party responsible for monitoring , includes schedule for reports, site visits, phone calls, and/or meetings)	Plan Maintenance (§ 1.6), Section 1.6, Plan Maintenance, pages 504-507	The plan includes sufficient information to meet the requirements of this element.		X
B. Does the new or updated plan describe the method and schedule for evaluating the plan? (e.g., identifies the party responsible for evaluating the plan, includes the criteria used to evaluate the plan)	Plan Maintenance (§ 1.6), Section 1.6, Plan Maintenance, pages 504-507	The plan includes sufficient information to meet the requirements of this element.		X
C. Does the new or updated plan describe the method and schedule for updating the plan?	Plan Maintenance (§ 1.6), Section 1.6, Plan Maintenance, pages 504-507	The plan includes sufficient information to meet the requirements of this element.		X
D. Does the updated plan include an analysis of whether the previously approved plan's method and schedule worked, and what elements or processes, if any, were changed?	Plan Maintenance (§ 1.6), Section 1.6, Plan Maintenance, pages 505-507	The plan includes sufficient information to meet the requirements of this element. The plan noted that "not all agencies reported" their mitigation actions and accomplishments from 2007 to the 2010 update. Recommended Revision: Provide additional detail on how		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: **September 2010**
Plan Submittal Date: **August 24, 2010**

		those non-reporting agencies will be included in future plan updates.		
SUMMARY SCORE				X

Monitoring Progress of Mitigation Activities

Requirement §201.4(c)(5)(ii): [The Standard State Plan Maintenance Process **must** include a] system for monitoring implementation of mitigation measures and project closeouts.

Requirement §201.4(c)(5)(iii): [The Standard State Plan Maintenance Process **must** include a] system for reviewing progress on achieving goals as well as activities and projects in the Mitigation Strategy.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe how mitigation measures and project closeouts will be monitored?	Section 1.5, Local Coordination, pages 367-369; Annexes to Section 1.5, pages 405, 490; Section 1.6, Plan Maintenance, pages 505-507	The plan includes sufficient information to meet the requirements of this element. The plan notes that "Local Data Collection Worksheets" (submitted by local jurisdictions) are used as a method of validating the State hazard assessment, vulnerability assessment, goals, and objectives, proposed and completed mitigation measures, and local plan integration. The plan includes a sample of the Clarke County Multi-Jurisdictional Mitigation Plan Data Collection Sheets. Recommended Revision: The plan should label annexes to coordinate with the table of contents.		X
B. Does the new or updated plan identify a system for reviewing progress on achieving goals in the Mitigation Strategy?	Local Coordination (§ 1.5); Plan Maintenance (§ 1.6)	The plan includes sufficient information to meet the requirements of this element.		X
C. Does the updated plan describe any modifications, if any, to the system identified in the previously approved plan to track the initiation, status, and completion of mitigation activities?	Section 1.5, Local Coordination, pages 367-369; Annexes to Section 1.5; Section 1.6, Plan Maintenance,	The plan includes sufficient information to meet the requirements of this element. Recommended Revisions: For future updates, provide discussion on whether the previously approved plan's method and schedule worked, and what elements or processes, if any, were changed.		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: **September 2010**
Plan Submittal Date: **August 24, 2010**

	pages 505-507			
D. Does the new or updated plan identify a system for reviewing progress on implementing activities and projects of the Mitigation Strategy?	Section 1.5, Local Coordination, pages 367-369; Annexes to Section 1.5; Section 1.6, Plan Maintenance, pages 505-507	The plan includes sufficient information to meet the requirements of this element.		X
E. Does the updated plan discuss if mitigation actions were implemented as planned?	Section 1.5, Local Coordination, pages 367-369; Annexes to Section 1.5; Section 1.6, Plan Maintenance, pages 505-507	<i>Note: Related to §201.4 (c)(3)(iii)</i> The plan includes sufficient information to meet the requirements of this element.		X
SUMMARY SCORE				X

SEVERE REPETITIVE LOSS STRATEGY (only required for 90/10 under FMA & SRL)
Repetitive Loss Mitigation Strategy

Requirement 201.4(C)(3)(v): A State may request the reduced cost share authorized under §79.4(C)(2) of this chapter for the FMA and SRL programs, if it has an approved State Mitigation Plan ... that also identifies specific actions the State has taken to reduce the number of repetitive loss properties (which **must** include severe repetitive loss properties), and specifies how the State intends to reduce the number of such repetitive loss properties.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe State mitigation goals that support the selection of mitigation activities for repetitive loss properties (see also Part 201.4©(3)(i))?	Mitigation Strategy (§ 1.4) & Annexes; Local Coordination (§ 1.5),	<i>[Note: Only required for SRL 90/10 under FMA & SRL]</i> The plan includes sufficient information to meet the requirements of this element. Planning Process Section 1.2, page 10 of 15 (pdf page 94) should mention the new programs Severe Repetitive Loss,		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: September 2010
Plan Submittal Date: August 24, 2010

	Section 1.4, Mitigation Strategy, page 236;	and Repetitive Flood Claims. These programs should be included in the other sections of the plan as appropriate (section seems to just repeat 2007 without updating to 2010) Planning Process Section 1.2, page 11 of 15 demonstrates no change in NFIP communities from 2007 plan. Additional narrative and involvement would be expected after recent historic flood events. Additional information regarding Severe Repetitive Loss is found in Loss Estimation Model 1.3-A and Risk Assessment Section (§1.3 pages 46-47 (table identifies unmitigated Repetitive Loss Properties by county as of April 2010).		
B. Does the new or updated plan consider repetitive loss properties in its evaluation of the State’s hazard management policies, programs, and capabilities and its general description of the local mitigation capabilities (see also Part 201.4©(3)(ii))?	Mitigation Strategy (§ 1.4) & Annexes; Local Coordination (§ 1.5), Section 1.5, Local Coordination, page 373	[Note: Only required for SRL 90/10 under FMA & SRL] The plan includes sufficient information to meet the requirements of this element.		X
C. Does the new or updated plan address repetitive loss properties in its risk assessment (see also Part 201.4(c)(2))?	Risk Assessment (§ 1.3); Local Coordination (§ 1.5) Section 1.3, Risk Assessment, pages 181-184; Section 1.4, Mitigation Strategy, pages 254-256;	[Note: Only required for SRL 90/10 under FMA & SRL] The plan includes sufficient information to meet the requirements of this element.		X
D. Does the new or updated plan identify, evaluate and prioritize cost-effective, environmentally sound, and technically feasible mitigation actions for repetitive loss properties (see also Part 201.4(c)(3)(iii))?	Mitigation Strategy (§ 1.4) & Annexes;	[Note: Only required for SRL 90/10 under FMA & SRL] The plan includes sufficient information to meet the requirements of this element.		X

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: **September 2010**
Plan Submittal Date: **August 24, 2010**

	Local Coordination (§ 1.5), Section 1.4, Mitigation Strategy, pages 247-252	The plan should provide sufficient detail to tell if the action is cost-effective, environmentally sound, and technically feasible. The plan does include action items on page 252.		
E. Does the new or updated plan describe specific actions that have been implemented to mitigate repetitive loss properties, including actions taken to reduce the number of severe repetitive loss properties?	Mitigation Strategy (§ 1.4) & Annexes; Enhanced Plan (§ 2 – Section 4) Section 1.4, Mitigation Strategy, pages 262-264; Annex 1.4-A, pages 268-273	[Note: Only required for SRL 90/10 under FMA & SRL] The plan includes sufficient information to meet the requirements of this element.		X
F. Does the new or updated plan identify current and potential sources of Federal, State, local, or private funding to implement mitigation activities for repetitive loss properties (see also Part 201.4(c)(3)(iv))?	Mitigation Strategy (§ 1.4) & Annexes Section 1.4, Mitigation Strategy, pages 253-262, 267; Annex 1.4-A, pages 268-273; Annex 1.4-B, pages 274 – 309;	[Note: Only required for SRL 90/10 under FMA & SRL] The plan includes sufficient information to meet the requirements of this element. Annex 1.4-A contains information regarding funding from 2007 to present. Annex 1.4-B describes ongoing programs and funding.		X
SUMMARY SCORE				X

Coordination with Repetitive Loss Jurisdictions

*Requirement §201.4(c)(3)(v): In addition, the plan **must** describe the strategy the State has to ensure that local jurisdictions with severe repetitive loss properties take actions to reduce the number of these properties, including the development of local mitigation plans.*

STANDARD STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VII

State: Iowa

Date of Plan: **September 2010**
 Plan Submittal Date: **August 24, 2010**

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan provide a description of the State process to support, through funding and technical assistance, the development of local mitigation plans in communities with severe repetitive loss properties (see also Part 201.4(c)(4)(i))?	Mitigation Strategy (§ 1.4); Local Coordination (§ 1.5) Section 1.4, Mitigation Strategy, pages 253-267; Section 1.5, Local Coordination, pages 363-376	[Note: Only required for SRL 90/10 under FMA & SRL] The plan includes sufficient information to meet the requirements of this element. Discussion regarding funding and technical assistance specifically supporting severe repetitive loss properties is included and broad. The plan discusses prioritization of State assistance for SRL; however the plan lists programs that could assist with SRL, and should identify which programs specifically will be used.		X
B. Does the new or updated plan include considerations for repetitive loss properties in its criteria for prioritizing communities and local jurisdictions that would receive planning and project grants under available mitigation funding programs (see also Part 201.4(c)(3)(iii))?	Local Coordination 1.5, Strategy, pages 253-254; Section 1.5, Local Coordination, pages 372-376,	[Note: Only required for SRL 90/10 under FMA & SRL] The plan includes sufficient information to meet the requirements of this element.		X
SUMMARY SCORE				X

Additional recommended revisions;

- Executive Summary should include a list of all funding (PA categories, Fire Management Assistance Grants, etc).
 - Changed to add in the funding sources for 322 mitigation plans
- Table in Subsection 5.6 (Community Profile), should include the units, (i.e. population rather than number) and be placed at the end of the section.
 - Units changed in this section
- Data in the Community Profile section should be updated to 2010 or most recent.
 - Some data updated and justification paragraph added because of data limitations and timelines for gathering and publishing data (i.e. 2010 census)
- Section 1.2, (p 8 of 15): Correct the date of approval of 2007 plan to September 18, 2007.
 - Date corrected
- Section 1.2, (p 5 of 15) references 201.6 and should reference 201.7.
 - Reference added for the tribal requirements of mitigation planning
- Section 1.2, (p 11 of 15) should highlight changes in NFIP communities since the adoption of the last plan. Note that according to the Community Status Book there are currently 538 communities in the National Flood Program while the text indicates that only 136 Iowa communities participate (source: <http://www.fema.gov/cis/IA.html>).
 - Text added for the NFIP participating communities; original text references the number of jurisdictions granted State authority for NFIP regulatory actions
- Risk Assessment, Section 1.3, Drought page 18 of 118 (pdf page 154). Typo, number conflict “. . . three (4) types of drought”.
 - Reference fixed
- Risk Assessment, Section 1.3, Drought page 18 of 118 (pdf page 154). Typo, number conflict “. . . eleven (20) periods of drought”.
 - Reference fixed
- Risk Assessment, Section 1.3, Drought page 20 of 118 (pdf page 156). Typo, number conflict “. . . – 3.0 to – 3.9. .”. Values are negative when the table notes the value as positive.
 - The Palmer drought index is -3.0 to -3.9 for a severe drought incident, the table reflects the state's score of magnitude/severity
- Use of the same terms and definitions throughout the analysis. (e.g. Severe Winter Storm is referenced in several ways through-out the text as Severe Winter Storms, Cold Winter, winter blizzard, winter storm event, etc. Windstorms have similar varying terms and references).
 - Terms were standardized in sections where possible
- Label Annex 1.4-C.
 - Annex labeled on the footer of each tab in the excel worksheet
- The REC Annex has a contradiction in number of customers per mile between p 4 of 30 and 15 of 30.
 - Reference fixed
- Risk Assessment, Section 1.3, (p 5 of 118), 4th paragraph: The Plan discusses all of the consolidated hazards except Infrastructure Failure. However, the hazard is listed on the Consolidated Hazard Chart (below the narrative).
 - Narrative added to include infrastructure failure
- Risk Assessment, Section 1.3, (p 73 of 118): The Table is not clearly identified nor is the source provided.
 - Source provided and narrative added to identify the table
- Risk Assessment Section 1.3, (p 53 of 118), 4th paragraph: The data is confusing. By mixing percentages and numbers makes interpretation of data difficult. For example, of the 275 Corps of Engineers levees affected by the 1993 flood, 85% held; however, levees that overtopped, eroded and ruptured and breached were noted as exact numbers rather than percentages. Use consistent terms, nomenclature, and presentation within and between hazards.
 - Narrative added to resolve any data interpretation issues (percentages added in to qualify the numbers presented)
- Planning Process, Section 1.2, (p 6 of 15): The SHMT decided that cascading impacts should not be considered in the formal risk assessment and in calculation of the final hazard score. However, Risk Assessment Section 1.3, (p 4 of 118), Step 3 of the Hazard Analysis and Risk Assessment (HARA) states, “What are the likely cascading effects of certain hazards?” Page 4 seems inconsistent with the SHMT's decision to not consider cascading impacts in calculation of final hazard score.
 - Narrative added to qualify the consideration of cascading impacts for response planning without affecting the hazard scoring methodology