Local Mitigation Plan Review Tool

Cover Page

The Local Mitigation Plan Review Tool (PRT) demonstrates how the local mitigation plan meets the regulation in 44 CFR § 201.6 and offers states and FEMA Mitigation Planners an opportunity to provide feedback to the local governments, including special districts.

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

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

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|  | Plan Information |
| Jurisdiction(s) | Connecticut Capitol Region (38): Town of Andover, Town of Avon, Town of Berlin, Town of Bloomfield, Town of Bolton, Town of Canton, Town of Columbia, Town of Coventry, Town of East Granby, Town of East Hartford, Town of East Windsor, Town of Ellington, Town of Enfield, Town of Farmington, Town of Glastonbury, Town of Granby, City of Hartford, Town of Hebron, Town of Manchester, Town of Mansfield, Town of Marlborough, City of New Britain, Town of Newington, Town of Plainville, Town of Rocky Hill, Town of Simsbury, Town of Somers, Town of South Windsor, Town of Southington, Town of Stafford, Town of Suffield, Town of Tolland, Town of Vernon, Town of West Hartford, Town of Wethersfield, Town of Willington, Town of Windsor, and Town of Windsor Locks |
| Title of Plan | Capitol Region Council of Governments (CRCOG) Natural Hazard Mitigation and Climate Adaptation Plan Update: 2024–2029 |
| New Plan or Update | Update |
| Single- or Multi-Jurisdiction | Multi-jurisdiction |
| Date of Plan | 1/15/2024 |
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|  | Review Information |
|  | State Review |
| State Reviewer(s) and Title | Ken Dumais, State Hazard Mitigation Officer |
| State Review Date | 3/27/2024 |
|  | FEMA Review |
| FEMA Reviewer(s) and Title | Rachael Wolff, CERC Planner  Marie-Annette (Nan) Johnson, R1 Senior Community Planner Technical Assistance Review conducted by Sean Loughlin 3/2/2024, 7/3/2024 |
| Date Received in FEMA Region | 6/18/2024 |
| Plan Not Approved | 5/13/2024 |
| Plan Approvable Pending Adoption | **7/3/2024** |
| Plan Approved | Click or tap to enter a date. |

Multi-Jurisdictional Summary Sheet

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

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| # | Jurisdiction Name | A. Planning Process | B. Risk Assessment | C. Mitigation Strategy | D. Plan Maintenance | E. Plan Update | F. Plan Adoption | G. HHPD Requirements | H. State Requirements |
| 1 | Town of Andover | Y | Y | Y | Y | Y |  |  |  |
| 2 | Town of Avon | Y | Y | Y | Y | Y |  |  |  |
| 3 | Town of Berlin | Y | Y | Y | Y | Y |  |  |  |
| 4 | Town of Bloomfield | Y | Y | Y | Y | Y |  |  |  |
| 5 | Town of Bolton | Y | Y | Y | Y | Y |  |  |  |
| 6 | Town of Canton | Y | Y | Y | Y | Y |  |  |  |
| 7 | Town of Columbia | Y | Y | Y | Y | Y |  |  |  |
| 8 | Town of Coventry | Y | Y | Y | Y | Y |  |  |  |
| 9 | Town of East Granby | Y | Y | Y | Y | Y |  |  |  |
| 10 | Town of East Hartford | Y | Y | Y | Y | Y |  |  |  |
| 11 | Town of East Windsor | Y | Y | Y | Y | Y |  |  |  |
| 12 | Town of Ellington | Y | Y | Y | Y | Y |  |  |  |
| 13 | Town of Enfield | Y | Y | Y | Y | Y |  |  |  |
| 14 | Town of Farmington | Y | Y | Y | Y | Y |  |  |  |
| 15 | Town of Glastonbury | Y | Y | Y | Y | Y |  |  |  |
| 16 | Town of Granby | Y | Y | Y | Y | Y |  |  |  |
| 17 | City of Hartford | Y | Y | Y | Y | Y |  |  |  |
| 18 | Town of Hebron | Y | Y | Y | Y | Y |  |  |  |
| 19 | Town of Manchester | Y | Y | Y | Y | Y |  |  |  |
| 20 | Town of Mansfield | Y | Y | Y | Y | Y |  |  |  |
| 21 | Town of Marlborough | Y | Y | Y | Y | Y |  |  |  |
| 22 | City of New Britain | Y | Y | Y | Y | Y |  |  |  |
| 23 | Town of Newington | Y | Y | Y | Y | Y |  |  |  |
| 24 | Town of Plainville | Y | Y | Y | Y | Y |  |  |  |
| 25 | Town of Rocky Hill | Y | Y | Y | Y | Y |  |  |  |
| 26 | Town of Simsbury | Y | Y | Y | Y | Y |  |  |  |
| 27 | Town of Somers | Y | Y | Y | Y | Y |  |  |  |
| 28 | Town of South Windsor | Y | Y | Y | Y | Y |  |  |  |
| 29 | Town of Southington | Y | Y | Y | Y | Y |  |  |  |
| 30 | Town of Stafford | Y | Y | Y | Y | Y |  |  |  |
| 31 | Town of Suffield | Y | Y | Y | Y | Y |  |  |  |
| 32 | Town of Tolland | Y | Y | Y | Y | Y |  |  |  |
| 33 | Town of Vernon | Y | Y | Y | Y | Y |  |  |  |
| 34 | Town of West Hartford | Y | Y | Y | Y | Y |  |  |  |
| 35 | Town of Wethersfield | Y | Y | Y | Y | Y |  |  |  |
| 36 | Town of Willington | Y | Y | Y | Y | Y |  |  |  |
| 37 | Town of Windsor | Y | Y | Y | Y | Y |  |  |  |
| 38 | Town of Windsor Locks | Y | Y | Y | Y | Y |  |  |  |

Plan Review Checklist

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

Plan updates must include information from the current planning process.

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

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

Element A: Planning Process

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| Element A Requirements | Location in Plan (section and/or page number) | Met / Not Met |
| A1. Does the plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction? (Requirement 44 CFR § 201.6(c)(1)) |  |  |
| A1-a. Does the plan document how the plan was prepared, including the schedule or time frame and activities that made up the plan’s development, as well as who was involved? | Exec., pp. 11–26  Sec. I, pp. 46–47  Sec. II, pp. 64–96  App. A–H | Met |
| A1-b. Does the plan list the jurisdiction(s) participating in the plan that seek approval, and describe how they participated in the planning process? | Ack., pp. 2–3  Exec., pp. 11–26  Sec. I, p. 46  Sec. II, pp. 66–70, 80–96,  App. A–G  Attachment Table | Met |
| A2. Does the plan document an opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development as well as businesses, academia, and other private and non-profit interests to be involved in the planning process? (Requirement 44 CFR § 201.6(b)(2)) |  |  |
| A2-a. Does the plan identify all stakeholders involved or given an opportunity to be involved in the planning process, and how each stakeholder was presented with this opportunity? | Ack., pp. 2–3  Exec., pp. 11–26  Sec. I, p. 46, 50–52  Sec. II, pp. 64–96  App. A–H | Met |
| A3. Does the plan document how the public was involved in the planning process during the drafting stage and prior to plan approval? (Requirement 44 CFR § 201.6(b)(1)) |  |  |
| A3-a. Does the plan document how the public was given the opportunity to be involved in the planning process and how their feedback was included in the plan? | Exec., pp. 12–13, 16–18  Sec. II, pp. 64–65, 70–85  App. A–H | Met |
| A4. Does the plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement 44 CFR § 201.6(b)(3)) |  |  |
| A4-a. Does the plan document what existing plans, studies, reports and technical information were reviewed for the development of the plan, as well as how they were incorporated into the document? | Exec., pp. 24–26  Sec. II, pp. 92–96  Sec. III, pp. 154, 172, 177  Sec. IV, pp. 229–247  Sec. VI, pp. 276–280  Citations throughout (e.g., mapping data, Sec. III)  Municipal Annexes (e.g., FEMA Flood Zones maps) | Met |

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| Element A Required Revisions |
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Element B: Risk Assessment

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| Element B Requirements | Location in Plan (section and/or page number) | Met / Not Met |
| B1. Does the plan include a description of the type, location, and extent of all natural hazards that can affect the jurisdiction? Does the plan also include information on previous occurrences of hazard events and on the probability of future hazard events? (Requirement 44 CFR § 201.6(c)(2)(i)) |  |  |
| B1-a. Does the plan describe all natural hazards that can affect the jurisdiction(s) in the planning area, and does it provide the rationale if omitting any natural hazards that are commonly recognized to affect the jurisdiction(s) in the planning area? | Sec. III, pp. 97-226 | Met |
| B1-b. Does the plan include information on the location of each identified hazard? | Sec. III, pp. 97-224;  Municipal Annexes, “Challenges,” Maps | Met |
| B1-c. Does the plan describe the extent for each identified hazard? | Sec. III, pp. 97-224 | Met |
| B1-d. Does the plan include the history of previous hazard events for each identified hazard? | Sec. III, pp. 97-224;  Municipal Annexes, “Challenges” | Met |
| B1-e. Does the plan include the probability of future events for each identified hazard? Does the plan describe the effects of future conditions, including climate change (e.g., long-term weather patterns, average temperature and sea levels), on the type, location and range of anticipated intensities of identified hazards? | Sec. III, pp. 97-224;  App. K | Met |
| B1-f. For participating jurisdictions in a multi‐jurisdictional plan, does the plan describe any hazards that are unique to and/or vary from those affecting the overall planning area? | Sec. III, pp. 97-224;  Municipal Annexes, “Challenges” | Met |
| B2. Does the plan include a summary of the jurisdiction’s vulnerability and the impacts on the community from the identified hazards? Does this summary also address NFIP-insured structures that have been repetitively damaged by floods? (Requirement 44 CFR § 201.6(c)(2)(ii)) |  |  |
| B2-a. Does the plan provide an overall summary of each jurisdiction’s vulnerability to the identified hazards? | Sec. III, pp. 97-224;  Municipal Annexes, “Challenges” | Met |
| B2-b. For each participating jurisdiction, does the plan describe the potential impacts of each of the identified hazards on each participating jurisdiction? | Sec. III, pp. 97-224;  Municipal Annexes, “Challenges” | Met |
| B2-c. Does the plan address NFIP-insured structures within each jurisdiction that have been repetitively damaged by floods? | Sec. III, pp. 172–180 (especially Table 40, p. 175)  App. O | Met |

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

Element C: Mitigation Strategy

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| Element C Requirements | Location in Plan (section and/or page number) | Met / Not Met |
| C1. Does the plan document each participant’s existing authorities, policies, programs and resources and its ability to expand on and improve these existing policies and programs? (Requirement 44 CFR § 201.6(c)(3)) |  |  |
| C1-a. Does the plan describe how the existing capabilities of each participant are available to support the mitigation strategy? Does this include a discussion of the existing building codes and land use and development ordinances or regulations? | Sec. IV, pp. 227-253  Municipal Annexes, “Capabilities” | Met |
| C1-b. Does the plan describe each participant’s ability to expand and improve the identified capabilities to achieve mitigation? | Sec. IV  Municipal Annexes in “Capabilities,” “Challenges,” and “Mitigation Strategies and Actions” sections. | Met |
| C2. Does the plan address each jurisdiction’s participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement 44 CFR § 201.6(c)(3)(ii)) |  |  |
| C2-a. Does the plan contain a narrative description or a table/list of their participation activities? | Sec. IV, pp. 230-235;  Municipal Annexes | Met |
| C3. Does the plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement 44 CFR § 201.6(c)(3)(i)) |  |  |
| C3-a. Does the plan include goals to reduce the risk from the hazards identified in the plan? | Exec., pp. 25–26, 33–39  Sec. IV, pp. 253–257  Municipal Annexes  App. A–C | Met |
| C4. Does the plan identify and analyze a comprehensive range of specific mitigation actions and projects for each jurisdiction being considered to reduce the effects of hazards, with emphasis on new and existing buildings and infrastructure? (Requirement 44 CFR § 201.6(c)(3)(ii)) |  |  |
| C4-a. Does the plan include an analysis of a comprehensive range of actions/projects that each jurisdiction considered to reduce the impacts of hazards identified in the risk assessment? | Exec., pp. 27–33  Sec. IV, pp. 258–268  Municipal Annexes  App. A, M | Met |
| C4-b. Does the plan include one or more action(s) per jurisdiction for each of the hazards as identified within the plan’s risk assessment? | Municipal Annexes  App. M | Met |
| C5. Does the plan contain an action plan that describes how the actions identified will be prioritized (including a cost-benefit review), implemented, and administered by each jurisdiction? (Requirement 44 CFR § 201.6(c)(3)(iv)); (Requirement §201.6(c)(3)(iii)) |  |  |
| C5-a. Does the plan describe the criteria used for prioritizing actions? | Sec. IV, pp. 260–268  App. M | Met |
| C5-b. Does the plan provide the position, office, department or agency responsible for implementing/administrating the identified mitigation actions, as well as potential funding sources and expected time frame? | Sec. IV, pp. 248–251  Municipal Annexes  App. L, M  Actions Spreadsheet with Funding Sources Key | Met |

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

Element D: Plan Maintenance

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| Element D Requirements | Location in Plan (section and/or page number) | Met / Not Met |
| D1. Is there discussion of how each community will continue public participation in the plan maintenance process? (Requirement 44 CFR § 201.6(c)(4)(iii)) |  |  |
| D1-a. Does the plan describe how communities will continue to seek future public participation after the plan has been approved? | Sec. V, pp. 270, 272–273, 275 | Met |
| D2. Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a five-year cycle)? (Requirement 44 CFR § 201.6(c)(4)(i)) |  |  |
| D2-a. Does the plan describe the process that will be followed to track the progress/status of the mitigation actions identified within the Mitigation Strategy, along with when this process will occur and who will be responsible for the process? | Sec. V, pp. 270–273  App. H  App. J | Met |
| D2-b. Does the plan describe the process that will be followed to evaluate the plan for effectiveness? This process must identify the criteria that will be used to evaluate the information in the plan, along with when this process will occur and who will be responsible. | Exec., p. 39  Sec. V, pp. 270–271  App. H, I  App. J | Met |
| D2-c. Does the plan describe the process that will be followed to update the plan, along with when this process will occur and who will be responsible for the process? | Exec., p. 39  Sec. V, pp. 270, 273–275  App. I | Met |
| D3. Does the plan describe a process by which each community will integrate the requirements of the mitigation plan into other planning mechanisms, such as comprehensive or capital improvement plans, when appropriate? (Requirement 44 CFR § 201.6(c)(4)(ii)) |  |  |
| D3-a. Does the plan describe the process the community will follow to integrate the ideas, information and strategy of the mitigation plan into other planning mechanisms? | Sec. V, pp. 270–273 | Met |
| D3-b. Does the plan identify the planning mechanisms for each plan participant into which the ideas, information and strategy from the mitigation plan may be integrated? | Sec. IV, pp. 228–247  Sec. V, p. 271  Municipal Annexes, “Capabilities” Sec. | Met |
| D3-c. For multi-jurisdictional plans, does the plan describe each participant's individual process for integrating information from the mitigation strategy into their identified planning mechanisms? | Sec. IV, pp. pp. 228–247  Sec. V, pp. 270–273  Municipal Annexes, “Capabilities” Sec. | Met |

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

Element E: Plan Update

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| Element E Requirements | Location in Plan (section and/or page number) | Met / Not Met |
| E1. Was the plan revised to reflect changes in development? (Requirement 44 CFR § 201.6(d)(3)) |  |  |
| E1-a. Does the plan describe the changes in development that have occurred in hazard-prone areas that have increased or decreased each community’s vulnerability since the previous plan was approved? | Sec. I  Municipal Annexes: “Community Overview,”  “Critical Facilities” “Capabilities,” and “Challenges” sections. | Met |
| E2. Was the plan revised to reflect changes in priorities and progress in local mitigation efforts? (Requirement 44 CFR § 201.6(d)(3)) |  |  |
| E2-a. Does the plan describe how it was revised due to changes in community priorities? | Exec., pp. 23-26  Sec. II, pp. 64-82  Sec. III, pp. 97-100  Sec. IV  Municipal Annexes  App. A, N | Met |
| E2-b. Does the plan include a status update for all mitigation actions identified in the previous mitigation plan? | Municipal Annexes, “Status of Previous Mitigation Strategies and Actions”  App. M, N | Met |
| E2-c. Does the plan describe how jurisdictions integrated the mitigation plan, when appropriate, into other planning mechanisms? | Sec. IV, pp. 240-242;  Municipal Annexes, “Capabilities” | Met |

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

Element F: Plan Adoption

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| Element F Requirements | Location in Plan (section and/or page number) | Met / Not Met |
| F1. For single-jurisdictional plans, has the governing body of the jurisdiction formally adopted the plan to be eligible for certain FEMA assistance? (Requirement 44 CFR § 201.6(c)(5)) |  |  |
| F1-a. Does the participant include documentation of adoption? | Unsigned copies provided in Sec. V, p. 270  App. P | Not Met |
| F2. For multi-jurisdictional plans, has the governing body of each jurisdiction officially adopted the plan to be eligible for certain FEMA assistance? (Requirement 44 CFR § 201.6(c)(5)) |  |  |
| F2-a. Did each participant adopt the plan and provide documentation of that adoption? | Unsigned copies provided in Sec. V, p. 270  App. P | Not Met |

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

Element G: High Hazard Potential Dams (Optional) – *Was not requested to review for HHPD requirements nor addressed on the State’s submitted Plan Review Tool.*

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

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

Element H: Additional State Requirements (Optional)

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

Plan Assessment

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

Element A. Planning Process

Strengths

The planning process narrative is detailed. It includes details on the events and meetings that were part of the plan’s development. The plan makes a clear connection between the meeting dates and topics covered during the meetings. An example of this is the section on the Workshops for the Local Coordinators (pp. 68–70).

The plan includes in-depth records of the planning process. The meeting agendas, meeting minutes, social media posts and presentation slides support the narratives in the planning process section. This will also help guide future updates.

A wide range of stakeholders was engaged in the planning process. This meant the plan could capture a lot of different viewpoints from those in and around the planning area. The plan includes details on engaging with different types of partners. This includes environmental justice (EJ) communities, utility companies, and public officials, among others.

The plan includes a summary of public feedback and how it was factored into the plan. This shows the planning team valued the insights gathered during the planning process.

The planning team reached out to neighboring jurisdictions, including those located across the border in Massachusetts. This is good practice since hazards and watersheds span municipal boundaries.

The updated parts of the plan are clearly marked. It is easy to see how the community's risk assessment and mitigation strategy have changed since the previous plan.

Maps and other data clearly show the planning area and hazard risks and vulnerabilities. This strength applies to both the main body of the plan and the Municipal Annexes.

The plan accounts for elements from Connecticut’s climate initiatives. Merging data, themes and ideas from other plans aligns the mitigation plan with other planning efforts underway.

Opportunities for Improvement

Invite stakeholders who are not in one of the five required groups. This will expand the types of concerns to address. It will grow the partnerships that can further hazard mitigation in the planning area. It will also strengthen the plan and how it gets carried out.

Consider building well-rounded municipal teams by engaging members from outside of emergency management, public safety and land use organizations. Local school officials may be able to weigh in on hazard risk, such as Bloomfield High School‘s flooding events, and support outreach. Other local partners include business owners, active nonprofit organizations and more. The Mitigation Actions were notably missing historic preservation, private businesses and industries’ facilities, and cultural asset long-term risk reduction.

Which specific non-profits and community-based organizations participated in this update? Please list them to help inform future updates. Also try to strengthen their connection to local and regional needs. For example, a Tolland public comment expressed the need to plan for “the emergency needs of the elderly, handicapped, and critical health care patients” (p. 91). In response, the University of Connecticut’s Emergency Management Program Specialist updated the Mansfield, Farmington, and Hartford critical facilities lists. This is a great first step! To go one step further, how could the planning team engage with social service organizations to learn about barriers to risk reduction action? Consider adding your findings to the action strategy.

Parts of Connecticut are diverse. The CRCOG web pages are available in over 70 languages (p. 83). Other than Spanish (p. 51), what are these languages? Which communities do they represent? How could mitigation actions address the unique needs of these groups?

Element B. Risk Assessment

Strengths

The plan follows a consistent naming convention and grouping for its hazards. This makes them easy to follow throughout the plan, including its Municipal Annexes and Appendices.

The plan clearly lays out why certain hazards were included in the analysis.

The history of hazards is wide-ranging. It gives a sense of the hazard’s extent in the planning area and the impacts of past events. Images, such as those in Granby and Enfield after Irene (p. 108), help show the hazard risk and impacts for a local audience.

Extent is described through the use of scientific scales that are relative to the planning area. Using widely recognized hazard scales paints a clear picture of an event’s effects. It also shows how the scale can apply or has applied to past hazard events. This makes the plan more useful to the community.

Maps, especially the local ones, clearly show the areas and sites that are most at risk.

The potential impacts weigh how future conditions will affect the way hazard events take place. Climate change, changes in population, and land use and development changes are weighed for each hazard. References to climate change are strong throughout the plan and hazard profiles.

Opportunities for Improvement

Potential impacts extend beyond critical facilities. Consider exploring risks to structures, systems, and natural and cultural resources. These could be included in the Municipal Annexes.

Factor watershed studies or other data sources into the risk assessment. Accounting for other planning mechanisms that note the planning area’s risk to hazards creates continuity amongst all plans and how they are carried out.

Include more details about the vulnerabilities of people (including underserved communities), structures, systems, and natural and cultural resources.

Problem statements could help sum up the vulnerabilities laid out in the risk assessment. The problem statements could also lead to potential actions to include in the mitigation strategy that are specific to each hazard. This would connect the two sections of the plan.

For more effective mitigation actions, continue to analyze and assess the root causes of why the assets and resources are vulnerable in the first place. For example, why is there a need for cooling shelters when the root cause is a lack of building codes and construction design both for existing and future homes, schools, facilities. These may lack adequate air conditioning and ventilation as well as may not be energy efficient with insulation and window treatments. Overloaded power grid systems may fail and so the need is to understand why this is and thus what would be needed to ensure people do not have to relocate in the first place.

Element C. Mitigation Strategy

Strengths

The plan gives a detailed description of each community's programs, plans, and policies to reduce risks.

Most of the plan's goals are specific to mitigation, rather than response and preparedness. They also address long-term risk. The mitigation action types cover different types of risk reduction action, such as structural, nature-based, and education and awareness.

The plan analyzes mitigation actions. It assesses costs and benefits. By including different types of methods, such as STAPLEE and PERSISTS, plan participants have options to weigh actions based on their own needs, values, and capabilities.

The mitigation strategy includes some strong, unique actions that will directly reduce the vulnerabilities for each hazard in the plan. It is a best practice to create unique actions for each of the vulnerabilities by its hazard(s) listed in the risk assessment. Appendix M is a helpful and clear way to present this information.

In Appendix M, “Benefits of an EJ tract?” is a helpful starting indicator for equity.

Opportunities for Improvement

Delve further into how to expand current capabilities for each plan participant. Spell out what is lacking (funding, personnel, authority, etc.). The Municipal Annexes address some strengths and gaps across the “Capabilities,” “Challenges,” and “Mitigation Strategies and Actions” sections. However, these three sections are inconsistent for each community. Consider providing further instructions on how to update these sections in plan updates. Or include a common visual such as a table or chart to keep track of capabilities.

While there are a good range of actions for each of the jurisdictions, there is a need for evaluation of what was presented. For more effective *mitigation* actions, these must be sustained actions that reduce or eliminate the risk and vulnerabilities for the long-term. Several of these actions do not address the root cause of the vulnerabilities and thus are short term fixes for ensuring preparedness and response. Several actions do not indicate an improvement over the existing problem (repairs, undersized standards for infrastructure, and insufficient regulations and possibly outdated building codes). Several are studies which are good but not connecting to how that will result in the long-term risk reduction of an identified vulnerability from the risk and/or capability assessments of the plan. The program has been in place for 20+ years. Effective actions show progress on the ground for the long-term solutions and for the construction and planned development for the future that is keeping up with the risk assessment updates. The strategy is needing additional mitigation actions for future development as well. Continue to effectively connect how the vulnerabilities (existing and future) are being eliminated or reduced by the end result of these mitigation actions that are cumulatively completed and updated every 5 years since 2000. Preparedness actions such as cooling centers can go in another section or another table other than mitigation actions to effectively communicate what is being mitigated for the long-term.

Recommend aligning the mitigation action types (p. 258) with those in [FEMA’s Local Mitigation Planning Handbook](https://www.fema.gov/sites/default/files/documents/fema_local-mitigation-planning-handbook_052023.pdf) (Task 6.3). While the plan's strategy can include non-mitigation actions, such as those addressing preparedness and response, note that long-term, sustainable risk reduction actions only count towards Element C-4.

In Appendix M, “Benefits of an EJ tract?” should be seen as a starting point for equity because context and follow through matter. Be careful how and where an action takes place. Consider the long-term effects, community priorities, intention of the action, and other factors.

The prioritization methodology may be considered unique. The Connecticut Institute for Resilience & Climate Adaptation (CIRCA) created it. The criteria are similar to STAPLEE, but it also awards unique modifiers like feasibility ("Permittable," "Realistic," "Transferable"), equity ("Equitable," "Safe," "Sustainable"), creativity ("Innovative") and expertise ("Scientific"). However, page 267 notes that "The methodology is more geared towards complex sets of solutions that address multiple climate-driven challenges. PERSISTS does not work as well for individual components of projects that have multiple phases.” Consider how to address this limitation.

Element D. Plan Maintenance

Strengths

The steps for updating the plan are described clearly. This will make the plan update process easy. The plan is specific, detailing the timeframe and expectations of Local Coordinators (pp. 272–273) and other participants.

The plan proposes a mitigation action tracking system. This makes it easy to monitor progress and to know which specific actions are advancing and which may have run into a hurdle. The templates are helpful and applicable to each community. A unique and strong template is “Progress Monitoring: Template for Annual Outreach to Environmental Justice Organizations” in Appendix H. Worksheets like Appendix I and J are also easy to use and understand.

Table 72 (pp. 269–270) is helpful for transparency and planning for update activities.

Opportunities for Improvement

Think of several ways to include the public in the implementation phase. Communities have presented to schools or other community groups, sent out annual surveys, ran tables at festivals and other events, and developed interactive websites. Consider unique and meaningful ways to engage with underserved and vulnerable groups.

Discuss the strength of the last plan’s maintenance strategy. Did the communities face any hardships during the monitoring, evaluating, and updating efforts? Were any strong elements carried over in the plan update? Explain how the last plan’s maintenance efforts shaped those planned for the next five years.

Element E. Plan Update

Strengths

The plan clearly describes the community's development changes since the last update. This is true in the Municipal Annexes, especially the “Community Overview” section.

Progress on mitigation actions is clear and in-depth.

Priorities in the plan recognize current conditions. They reflect the planning process, risk assessment, and mitigation strategy.

The plan provides details on how the hazard mitigation data, goals, actions, and other elements were included in other plans and planning processes.

Opportunities for Improvement

Adding lessons learned about carrying out mitigation actions would strengthen the plan. A short narrative on some “success stories” would also help.

Cumulatively show the outcomes of the long-term risk reduction in each of these communities and as a region over the last 20 years and with each 5 year update to more effectively communicate what the region and these communities look like when they reach their mitigation goals.

Element G. HHPD Requirements (Optional)

Strengths

[insert comments]

Opportunities for Improvement

[insert comments]

Element H. Additional State Requirements (Optional)

Strengths

[insert comments]

Opportunities for Improvement

[insert comments]