	Planning Process (FEMA Element A)	NCEM	CoFB	ТоН	unincorporated	Becker comments	TF Comments
P1 (A1-a)	The plan must document the current planning process.	Planning Process, pgs. 4-12 and documented in Appendix B, pgs. 121-140	p 4-12	Page 4-12	5		• Whole TF agrees this is described in the Planning Process section and proof is in Appendix B
P2 (A1-b)	The plan must list the jurisdiction(s) in the current plan that will seek approval.	Planning Process, pg. 7	р7	Page 13-27	vii		 why reference the info page with blanks for adoption dates ??? EM, ToH, and CoFB agree specific text listing the jurisdictions seeking approval is Executive Summary, pg. 1 and in the Planning Process section pg 7-8; and names of the individuals who are supposed to represent those jurisidctions are listed in Appendix B
P3 (A1-b)	The plan must list the representative from each jurisdiction that will seek approval and how they participated in the planning process. (At a minimum, it must identify the jurisdiction represented and the person's agency and title within the jurisdiction.)	documented in Appendix C, pg.	appendix c	Page 140	Appendix A. Appendix C 117, 123, 140	M Williams indicates Town of Callahan wishes to participate. No reference to local written rules re: what constitutes "participation". FEMA 2025 Local Mitigation Planning Policy Guide states participation can be defined and met in a variety of ways. Without local written guidance can we exclude Callahan?	 Appendix A is a placeholder for copies of the jurisdictional adoptions; it does not indicate who will seek approval or how they participated in the planning process ??? pg 117 is the Appendices cover page ??? pg 123 is page 3 of 5 of the list of stakeholder emails ??? The FEMA Guidance says, "jurisdictions must be engaged and actively participate in the development of the plan, providing input and directly providing, affecting, or editing plan content," so no. There is a documented process to add a jurisdiction to a multi-jurisdictional LMS after it has been approved by FEMA. (see FDEM and FEMA guidance docs) EM, ToH, and CoFB agree Planning Process pg 7-8 says the LMS TF representatives will seek approval and describes how the TF members are supposed/expected to participate in planning and development; Appendix C provides the actual names of the jurisdictional representatives on the TF (the minimum requirement)
P4 (A2)		Planning Process, pg. 8 and documented in Appendix B, pgs. 121-140	p8	Pages 114-116, 118-174	2, 5, 8, 117, 123	Where are the After Action Reports?	 pg 8 has a statement of how the stakeholders were presented the opportunity Appendix B provides examples as proof After Action Reports have nothing to do with mitigation or this criterion ??? pg 114-116 Plan Maintenance does not discuss current planning process and 118-174 is all of the Appendices (not accceptable ref) EM and ToH agree the Planning Process pg 8
P5 (A3)	The plan must document how the public had an opportunity to be involved in the current planning process and what that participation entailed, including how underserved communities and vulnerable populations within the planning area were provided an opportunity to be involved.	Planning Process, pg. 8 and documented in Appendix B, pgs. 119-130	appendix b	Page 118-174	14, Appendix B 119		 pg 8 has a statement of how the public were presented the opportunity 118-174 is all of the Appendices - not acceptable ref pg 14 is location, topography, and geology ??? The public had opportunity to provide input during the process; there is even a survey they can use on OneNassau.com they can use if they cannot attend a quarterly meeting EM and ToH agree pg 8 describes and Appendix B provides examples as proof
P6 (A4)	IINTORMATION WERE REVIEWED AND NOW	Planning Process, pg. 9 (now 11-12)	p 9	Page 13-27, 10- 11, 30,33,37,42,43,4 8,58,59,60,61,74, 75,76,77- 81,87,88,91	3,9, 100, 146, 162		 a list of current documents that might have had mitigation information added is provided in the planning process section - has been beefed up Existing Policies, Programs, and Resources related to mitigation are described in a separate section

P7 (A4)	may use other jurisdiction-specific materials, including non-regulatory flood mapping products, that improve upon NFIP regulatory flood mapping products.	Planning Process, pgs. 10-11	p15, 42, 43, 111, 112	Page 42,37,15,10,11,9 9-105	10, 15, 43, 101 Appendix G 147, 111		 additional non-regulatory are on 15, 42, 43, etc. Appendix G ??? FEMA NFIP pages 10 and 11 are correct for regulatory flood maps
Risk Assessm	The plan must include a description of all natural hazards that can affect the jurisdiction(s) in the planning area and their assets, such as dams, located outside of the planning area.	Jurisdictional Profiles, pgs. 25-27	CoFB p28-96	ToH Page 26-27	unincorporated 25-96	it does not explicitly describe assets like dams located <i>outside</i> the planning area that could affect the jurisdiction.	 • ??? the criterion says that it must describe all <u>natural hazards</u> that can affect our planning areas and assets (including those we rely on that are outside of the area). • TF agrees that the table of local hazards and the community lifelines they affect provided in the Jurisdictional Profile section meets this criterion. (per FDEM - listing the entire Hazard Profile section is not acceptable)
R2 (B1-a)	The plan must provide rationale for the omission of any natural hazards that are commonly recognized to affect the jurisdiction(s) in the planning area.	pg, 16 Jurisdictional Profiles, pg. 25 Hazard Profiles, pg. 29	p 16, 29	Page 172, 31, 32, 33, 34, 40, 41, 52, 53, 55, 56, 65, 67, 71, 74, 85, 87, 90	16, 25, 29		• • TF agrees that pg 16 says no sinkholes; pg 25 says no algal blooms, space weather, or diseases; pg 29 lists the six hazards covered and repeats why others are not included
R3 (B1-b)	The plan must include information on location for each identified hazard.	Thunderstorm, pg. 35 Flood, pgs. 40-42 Tropical Cyclone, pgs. 56-57 Extreme Temps, pgs. 73-74 Drought, pg. 87 Wildfire, pgs. 90-91	p 35, 41, 56, 73, 87, 90	Page 31, 33, 36, 38, 40, 42, 43, 44- 48, 57, 58, 59, 60- 63, 74, 75-81, 87- 88, 91-92	I / / / L/ FIGILITE TY IN // XI		 pg 22 only details demographics, nothing to do with location of hazards ??? pg 42 has information on coastal high tide inundation Fig 19 on pg 43 is of FEMA SFHA for Nassau there is no Fig 33 on pg 72 ??? Fig 33 is dew point heat comfort levels ??? pg 72 is a Fig 37 detailing winter storm impact color scale (extent) ??? the locations vulnerable to each hazard are listed in each hazard description
R4 (B1-c)	The plan must provide the extent of the hazards that can affect the planning area.	Thunderstorm, pgs. 35-36 Flood, pgs. 42-44 Tropical Cyclone, pgs. 53-58 Extreme Temps, pgs. 71-74 Drought, pgs. 85-86 Wildfire, pgs. 90-91	36, 47, 63, 81, 89, 92	Pages 36,38,42,43- 44,46,48,57- 60,63,71,74,76,7 7,78,87,91,92,	22-29 Pg 42. Page 55. and page 71		 extent is how it is measured and likely extent of the hazard impact on the jurisdiction using that scale pg 22 only details demographics, nothing to do with extent of hazards ??? pg 55 is a scientific description of storm surge formation ??? the extent of each hazard, where it falls on a scale that determines impact levels and risks, is described in each hazard description
R5 (B1-d)	•	Thunderstorm, pgs. 35-36 Flood, pgs. 44-47 Tropical Cyclone, pgs. 59-63 Extreme Temps, pgs. 74-81 Drought, pgs. 87-88 Wildfire, pgs. 91-92	35, 44, 59, 74, 87, 91	Pages 36,38,42,43- 44,46,48,57- 60,63,71,74,76,7 7,78,87,91,92	29-39, 40, 25052, 54, 58, 64-67, 74-76 , 82, 8- 88		 pg 29 is the intro to hazard profiles; other pages??? there is a section under each hazard that is titled "historic occurrences" that should be referenced

R6	(B1-e)	The plan must include the probability of future events for the identified hazards that can affect the planning area.	Thunderstorm, pgs. 36-37 Flood, pg. 47 Tropical Cyclone, pg. 63 Extreme Temps, pg. 81 Drought, pg. 89 Wildfire, pgs. 92-93	37, 47, 63, 81, 89, 92	Page 30, 37,47,63,81,89,9 2	37, 47, 63, 81, 89, 92		• • TF agrees that each hazard has a calculated probability of occurrence titled "local probabilities" that should be referenced to meet this criterion
R7	(B1-f)	area and between participating jurisdictions, the plan must specify the unique and varied risk information for each applicable jurisdiction and their	Thunderstorm, pgs. 36-37 Flood, pgs. 47-48 Tropical Cyclone, pg. 63 Extreme Temps, pg. 81- Drought, pg. 89 Wildfire, pg. 92-93	115-116	Page, 91,76- 78,74,59,48,46,1 47,	48, 74, 76	Collaboration is implied, but not tactical. No breakdown of what each jurisdiction does operationally (Flow chart would be helpful)	 make sure Okeefenokee is pointed out for wildfire risk on the west side of the county - done. highlight the differences between jurisdictions - can we BEEF UP? this criterion has nothing to do with collaboration, response, or tactics ??? TF agrees that each hazard has a section titled "local proababilities, vulnerabilities, risks" that should be referenced; Include Risk Analysis in Appendix H
R8	(B2-b)	impacts on each participating jurisdiction	Hazard Impacts on Community Lifelines Table, pgs. 26-27 Appendix H, pgs. 165-168	31, 40, 52, 65, 85, 90	Page 146,172,89,81,63 ,36	31, 40, 52, 93-94, 95- 97, 96		 In Hilliard, all of fire and EMS services are on one side of the train tracks - trains are not natural but we can add this to Jurisdictional Profile - done. details of hazard impacts by Community Lifelines are on pgs 26-27; Include Risk Analysis in Appendix H
R9		The plan must describe the overall vulnerability of each participant to the identified hazards.	Jurisdictional Profiles, pgs. 14- 19, 22-24 Hazard Profiles, pgs. 28-96 Thunderstorm, pgs. 37-38 Flood, pgs. 40-42, 47-48 Tropical Cyclone, pgs. 62-64 Extreme Temps, pgs. 72-74, 81- 82 Drought, pgs. 88-89 Wildfire, pgs. 92-94	37, 47, 63, 81, 89, 92	Page 38,62,63,75,90	37, 47, 63, 81, 89, 93, 95-97		 pgs 95-97 only details potential wildfire mitigation strategies, nothing about overall vulnerabilities ??? EM, CoFB, and ToH agree that calculations for each hazard do include vulnerability
R1	0 (B2-a)	For plan updates, the risk assessment must meet Element E1-a (Changes in Development).	Jurisdictional Profiles, pgs. 20- 24		Page 102, 99, 143.	109		• jurisdictional profiles describe changes in development, population, etc DOES THIS MEET FDEM UPDATE MANUAL AND APPENDICES GUIDANCE?
		institutional, etc.) of repetitive/severe repetitive loss properties for each jurisdiction.	Mitigation Strategies, pgs. 111- 114	111-112	Page 47-48,110- 113	111, Table 19, Table 20	part of this document?	 Callahan is included because it has RL structures - it is an outside the jurisdiction asset at risk from our natural hazard; it does not include them in the strategy Tables detail the numbers for all jurisdictions - provided by CRS Coordinators
Mi	tigation Str	ategy (FEMA Element C)	NCEM	CoFB	ТоН	unincorporated	Becker comments	TF Comments
S1	(C1-a)	strategy. This must include a discussion of	Mitigation Strategies, pgs. 100- 109 Appendix E, pgs. 144-146	99	Page 43-45	page 99, 100-102 (stormwater work together)	plan says it will be updated, monitored, etc., but doesn't give specific triggers, check-in schedules, or feedback loops (e.g., what gets evaluated quarterly?). Drought - missing the ordinance establishing the Ameila Island Tree Commission, Missing capital Improvements Project list that explains how projects are chosen, funded, and priortized,	 NEED current capabilities for each jurisdiction ??? comment - this criterion does not mention plan updates, triggers, checkin schedules, feed-back loops; or drought; or a Capital Improvement Project list, how CIP projects are chosen, funded, and prioritized ??? Does any jurisdiction want to add any other capability, program, or funding to support mitigation that has not been included in the Mitigation Strategies section?

S2 (C1-b)	The plan must describe the ability of each participant to expand on and improve the capabilities described in the plan (see S1).	Appendix Eng. 144 146	109	Page 99,100,114- 116	page 100-102	the plan outlines existing capabilities, it does not directly discuss each participant's ability or plans to expand upon and improve these capabilities.	weak - still NEED a paragraph from each jurisdiction on their ability to expand mitigation capabilities - this info is supposed to come from jurisdiction TF members - where is it?
S3 (C2-a)	The plan must describe participation in the NFIP for each participant , as applicable, in accordance with NFIP regulatory requirements (see reviewer notes).	Mitigation Strategies, pg. 101- 102 Appendix G, pgs. 150-151 (Repetitive Flood Loss Letter)	111	Page 110,112	page 101, Table 19 and 20- Page 111		 weak - still NEED from CoFB and County - actions taken as part of NFIP: adoption of latest FIRMS, minimum floodplain management criteria, evidence of implementation and enforcement (how) of regulations; appointment of designee to implement the commitment to the NFIP; description of how they implement substantial improvement and substantial damage components of the NFIP after an event. pg 101-102, 110-112 are good to partially meet criterion TF agrees NFIP Adoption, Building Regulations, and Enforcement section should address this but needs to be beefed up
S4 (C3-a)	The plan must include goals to reduce the risk of the identified hazards.	Executive Summary, pg. 3 has goal and objectives Planning Process, pg. 7 Overarching Goal		Page 36,63,81,89,92,9 8,105,109	page 6		 pg 6 is the Code of Fed Regulations ??? ToH pages are the vulnerailities and potential mitigation strategies for each hazard Planning Process includes an overarching goal and several objectives have been included
S5 (C4-a)	The mitigation strategy must include an analysis of a comprehensive range of actions or projects that the participants considered to specifically address vulnerabilities identified in the risk assessment.	Mitigation Strategies, pgs. 99- 100 Thunderstorm, pgs. 37-39 Flood, pgs. 49-51 Tropical Cyclone, pg. 64 Extreme Temps, pgs. 82-84 Drought, pg. 89 Wildfire, pgs. 94-97	98-113	Page 67-71	104-105		 each hazard has a section that reviews potential mitigation strategies that should be referenced pg 104-105 is the CLAM project table ??? pg 67-71 is extreme temperature profile ??? pg 98-113 is existing mitigation programs ??? A comprehensive list of a variety of potential mitigation measures (tables and lists) specifie to each hazard is included in each hazard profile; add the new project list that includes a mitigation project for each hazard from each jurisdiction?
S6 (C4-b)	Each plan participant must identify one or more mitigation actions the participant(s) intends to implement for each hazard addressed in the risk assessment.	Appendix I		Page 170	page 105-107		 pg 105-107 describes existing building codes and projects for some, but not all hazards Appendix I pg 170 is current project list for each jurisdiction and hazard
S7 (C5-a)	The plan must describe the criteria used for prioritizing the implementation of the actions. The criteria must include an emphasis on the extent to which benefits are maximized, in relation to the associated costs of the action.	Annendiy I ngs 171-175		Page 170, 164- 166	Page 12- Capital Improvement Plan or Page 38, Appendix J Scoring Rubic Pg 171	maybe less page 12 and solidly 38	 pg 12 has no reference to a Capital Improvement Plan (why is this in comment) ??? It is the last page of the Planning Process section - Nothing about the criteria used for prioritization on this page ??? pg 38 is potential mitigation for severe thunderstorms ??? Nothing about the criteria used for prioritization on this page ??? • EM and ToH agree Appendix J pg 171 is the Scoring Rubric
S8 (C5-b)	The action plan must identify who is responsible for administering each action, the action's potential funding sources, and expected time frames for completion.	Appendix I, pg. 170		Page 168-170	LMS task force Page 131? page 170		 pg 131 is page 6 of a Task Force Meeting Agenda ??? EM and ToH agree Appendix I pg 170 is the standard project list template which includes who is responsible, funding source, and time frame for each proposed action
Plan Main	The plan must describe how the participant(s) will continue to seek public participation after the plan has been approved and during the plan's implementation, monitoring, and evaluation.	Plan Maintenance & Updates, pgs. 115-116	СоFВ	ToH Page 118,119	unincorporated 115	projects are referenced (and ranked in an appendix), there's limited detail on who does what, when, and how during activation or recovery	 • who does what, when, and how during any activation or recovery has nothing to do with the LMS or this criterion ??? • Plan Maintenance section describes review and maintenance during stakeholder meetings and updates to FDEM annually

M2 (D2-a)	The plan must identify how, when and by whom the plan will be tracked for implementation over its five-year cycle (monitoring).	Plan Maintenance & Updates, pgs. 115-116		Page 114-116	115		Plan Maintenance section describes review and maintenance during stakeholder meetings and updates to FDEM annually
M3 (D2-b)	The plan must identify how, when and by whom the plan will be assessed for effectiveness at achieving its stated purpose and goals (evaluating).	Plan Maintenance & Updates, pgs. 115-116		Page 115	115		Plan Maintenance section describes review and maintenance during stakeholder meetings and updates to FDEM annually
M4 (D2-c)	The plan must identify how, when and by whom the plan will be reviewed and revised at least once every five years (updating).	Plan Maintenance & Updates, pgs. 115-116		Page 115-116	115		Plan Mainenance section describes review and maintenance during stakeholder meetings and updates to FDEM annually
M5 (D3-a)	The plan must describe the community's process to integrate the plan's data, information, and hazard mitigation goals and actions into other planning mechanisms.	Starts to be addressed in Planning Process, pg. 12; should be addressed in Plan Maintenance		Page 115-116	110		 pg 110 describes coastal flood mitigation for the CoFB and CRS ??? Since this LMS is Multi-jurisdictional, M6 applies
M6 (D3-c)	A multi-jurisdictional plan must describe each participant's individual process for integrating information from the mitigation strategy into their identified planning mechanisms.	Starts to be addressed in Planning Process, pg. 12; should be addressed in Plan Maintenance		Page 118		the plan describes the overall community process for integration (page 115), it does not explicitly outline a distinct, individual integration process for <i>each</i> participating jurisdiction.	 still NEED CoFB and County to provide their statements on the process - how this mitigation plan will be integrated into other plans. ToH integrates LMS into their CIP process - added
M7 (D3-b)	The plan must identify the local planning mechanisms where hazard mitigation information/actions may be or have been integrated. The identified list of planning mechanisms must be applicable to the participanting jurisdictions and not contradict the participants' identified capabilities.	Planning Process, pgs. 9-11 Plan Maintenance & Updates, pgs. 115-117		Page 114-119	115		 County, CoFB, and ToH - NEED to list planning mechanisms that will benefit from this LMS information, or plans/codes that will be updated to include this information. WHAT IS THE DIFFERENCE BETWEEN M5/6 and M7? (find a statement that says TF reviewed, consulted, and analyzed various documents; the jurisdictions have addressed mitigation in Comp Plan, Land Development Regulations)
Plan Update (FEMA Element E)	NCEM	CoFB	ТоН	unincorporated	Becker comments	TF Comments
U1 (E1-a)	The plan must describe changes in development that have occurred in hazard-prone areas and how they have increased or decreased the vulnerability of each jurisdiction since the previous plan was approved.	Jurisdictional Profiles, pgs. 20- 24		Page 1-3	no site found	the document does not contain a specific retrospective analysis of how actual development changes since the previous plan have impacted vulnerability for each jurisdiction .	 CoFB - NEED - has development increased or decreased vulnerability? County - NEED - has development increased or decreased vulnerability? ToH - NEED - has development increased or decreased vulnerability?
U2 (E2-a)	The plan must describe how it was revised due to a change in priorities for each jurisdiction.	Executive Summary, pg. 3 Planning Process, pg. 7		Page 3	no site found	does not specifically detail how the <i>current</i> plan was revised based on changes in priorities for each jurisdictio n from the previous planning cycle.	 County, CoFB - NEED - how have changes in priorities affected change to this LMS? EM and ToH agree that their priorities have not changed; mitigation goal remains as stated in Executive Summary
U3 (E2-b)	The plan must describe the status of all hazard mitigation actions in the previous plan by identifying whether they have been completed or not, for each jurisdiction.	Mitigation Strategies, pgs. 110- 114 Appendix I, pgs. 169-170		Page 168-169		P168 only describes projects. Doesnot discuss strategies implemented in ordinance, policy, etc.	 This criterion specifically asks for the status of mitigation actions in the previous plan. It does not ask about local changes in policy or ordinance. ??? EM and ToH agree that Appendix I details status of all hazard mitigation projects/actions

U4 (E2-c)	The updated plan must explain how the jurisdiction(s) integrated information from the mitigation plan into other planning mechanisms, as a demonstration of progress in local hazard mitigation efforts. If information from the previous plan was not integrated into other planning mechanisms, this must be stated.	Progress, pg. 118		Page 115	no site found	it does not explain how information from the previous plan was integrated, or if it wasn't.	 County still NEEDS to provide details on how information from the previous plan was integrated, or if it wasn't CoFB still NEEDS to provide details on how information from the previous plan was integrated, or if it wasn't EM and ToH agree this is met by the list of last LMS' projects' statuses and the progress updates beginning on pg 118 - have other plans been updated recently using information from the last LMS?
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