

**APPENDIX T:
Annual State Hazard
Mitigation Plan
Updates**

Appendix T: Annual Updates

This appendix will serve as the location in the plan where annual reviews, updates, and progress reports will be included.

Florida §252.3655 requires that the Florida Division of Emergency Management (FDEM) natural hazards interagency workgroup coordinator prepares an annual progress report that be submitted to the Governor, the President of the Senate, and the Speaker of the House of Representatives. According to the statute, the annual progress report shall:

- Assess the relevance, level, and significance of current agency efforts to address the impacts of natural hazards; and
- Strategize and prioritize ongoing efforts to address the impacts of natural hazards.

In addition to these requirements, the workgroup coordinator, who also serves as the State Hazard Mitigation Plan (SHMP) Planner, will include annual reviews and updates of the SHMP in the annual progress reports. The SHMP Planner will complete the annual reviews and updates, with assistance from the Mitigation Planning Unit and the Mitigate FL group. The annual reviews and updates will focus on the following topics:

- Hazard profiles and historical occurrences;
- Goals and objectives;
- Project closeouts;
- Program Administration by States audits;
- Various other audits;
- Loss Avoidance Reports after any federally declared disaster in the state; and
- Any mitigation success stories from the state that year.

Each year, this annual review and report will be added to this appendix. The annual reports will also be posted on each Mitigate FL required agency website, including the FDEM website.

Another portion of this annual review and report will be the Federal Emergency Management Agency (FEMA) Annual Consultation documentation. FEMA conducts Annual Mitigation Program Consultations with the State of Florida. During this annual consultation, FEMA and the State review the Enhanced Mitigation Program and validate the capabilities of the state. This consultation helps the state to be sure its mitigation program is “On Target” and complies with Enhanced requirements.

During this consultation, topics of discussion will include, but are not limited to, status and specific needs for:

- Advancing implementation of the state mitigation strategy;
- Ensuring the state mitigation plan remains relevant over the approval period;
- Facilitating the plan update and approval process;

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- Building mitigation capabilities through training, technical assistance, and partnerships with FEMA and other Federal agencies;
 - Advancing local and tribal, as applicable, mitigation planning, including submitting approvable mitigation plans to FEMA; and
 - Maintaining and/or improving mitigation capabilities, with particular attention to human resources and funding; and Maintaining and/or improving HMA grants management performance, including effectively using all available funding from FEMA mitigation programs.

After each consultation, FEMA will provide the state with a summary of the discussion. FEMA will also document recommendations for improvements to the State Mitigation Program and any items that should be corrected or modified before the next state mitigation plan update. This documentation will be included in the annual review and report discussed above.

This appendix and the annual reviews and reports will be reviewed before the next five-year update to ensure that anything added or changed over the next five years is included in the next official update of the plan.

The 2017 FEMA Annual Consultation documentation has been included in this appendix because it was completed while the 2018 SHMP update was occurring. It shows that the State of Florida is currently On Target for all Enhanced SHMP requirements.

- 2017 Enhanced State Mitigation Capability Validation – Summary of Findings Template
- 2017 Florida Mitigation Program Consultation – Summary

Below are placeholder pages for each anticipated annual review and report between 2018 and the next five-year update in 2023.

**Enhanced State Mitigation Capability Validation
Summary of Findings Template (v. 031215)**

ENHANCED STATE CAPABILITY VALIDATION SUMMARY OF FINDINGS

INSTRUCTIONS: The purpose of the **Summary of Findings** is for use by FEMA Mitigation Planning and Hazard Mitigation Assistance (HMA) staff to provide a written summary of the highlights of the validation to determine if the state is maintaining the capability to effectively manage the increased Hazard Mitigation Grant Program funding.

FEMA may provide suggestions for improvement as part of the **Summary of Findings** or in a separate document. FEMA will not require a plan update as part of the validation process but the state may consider the suggestions as part of the next plan update.

If FEMA determines that the state's capability to manage the increased HMGP funding has declined, FEMA will work with the state to identify appropriate activities to improve the mitigation capabilities as well as determine a reasonable timeframe for completing these actions. The state will have 30 days after receipt of the **Summary of Findings** to submit to FEMA the proposed actions that the state will take to make the improvements.

FEMA Regional Mitigation Planning staff will annually review performance regarding if the state is maintaining comprehensive mitigation program to achieve mitigation goals. For more information, refer to the *State Mitigation Plan Review Guide, Section 4.3 State Capabilities* (Element E5).

FEMA Regional HMA staff will review performance regarding capabilities to effectively use available mitigation funding as well as manage the increased HMGP funding. FEMA may review data regarding *Elements E5 to E9*. In addition, FEMA may consider reviewing performance related to additional measures, such as:

- HMGP obligation rates
- Average time from declaration to closeout

For more information on requirements for Elements E5 to E9, refer to the *State Mitigation Plan Review Guide, Section 4.3 State Capabilities* (Element E5) and *Section 4.4 HMA Grants Management Performance* (Elements E6 to E9).

FEMA Regional HMA staff will review the last four quarters of past grants management performance data for all FEMA HMA programs. FEMA may extend the timeframe when sufficient data is not available and will supplement with any additional necessary grants management data or may request additional data from the state, if necessary.

**Enhanced State Mitigation Capability Validation
Summary of Findings Template (v. 031215)**

OT=on target; NOT=not on target	OT / NOT
State Mitigation Capabilities	
<p>V1. (E5.) Is the state effectively using existing mitigation programs to achieve mitigation goals? [44 CFR §§201.5(a) and 201.5(b)(3)] <i>FEMA Mitigation Planning staff focus on effective use of mitigation programs</i> <i>FEMA HMA staff focus on full use of available HMA funding</i></p> <p><u>Requirements for E5:</u></p> <p>a. <i>The enhanced plan must document how the state has fully made use of the funding available through the FEMA assistance programs (for example, PA C-G, HMGP, PDM, and FMA). If the state has not made full use of available funding, the enhanced plan must document the reasons why funding was not used and explain the process to improve this capability.</i></p> <p>b. <i>The enhanced plan must document how the state effectively uses existing state programs to achieve its mitigation goals.</i></p>	OT
<p>Comments: The Florida Enhanced State plan was approved August 24, 2013, and is valid for five years, through August 23, 2018. This is a review of performance from August 25, 2015 through August 24, 2016. In that time frame Florida has made full use of HMA funding opportunities.</p> <p>RIV Mitigation Planning: The 2013 Florida State Enhanced Plan Update documented how the state planned to make full use of the Federal Emergency Management Agency (FEMA) mitigation grant program funding and how they would coordinates with local communities. FEMA mitigation grants have been used to leverage state, local, and other funds for maximum mitigation activity. For the purpose of the 2017 State Enhanced Validation, grant documentation has been provided by the HMA branch and is included with the HMA documentation. Since the next full update will not be completed until 2018, this requirement has been met and will be reviewed annually until the next update is completed for the 2018 Enhanced Plan Update. The State of FL has 100% approved plans with 97.5% population coverage. To date, three (3) Plan Audit reviews have been conducted with no findings. A monthly report is sent to the Region from the State of FL providing plan status updates. All APP letters are prepared by Region IV. The PAS program has been a great success and has strengthen the working relationship between the State of Florida and the Region.</p> <p>ND: FL again qualified for FMA Technical Assistance (TA) funding in 2016 by submitting and being awarded > \$1 M in Fed share for 2015 FMA. The attached ND Closeout Tracker shows all ND projects approved, award dates and closeout status.</p> <p>HMGP: FL continues to implement the Program Administration by State (PAS) Pilot program. FL was the first state in the nation to fully participate in the program. See the attached summary. Currently Florida is managing four disasters through PAS. The two most recent DRs, 4280 H. Hermine & 4283 H. Matthew have PAS Agreements signed by FEMA and are pending signature and approval by FDEM.</p>	
HMA Grants Management Performance	
<p>V2. (E6.) With regard to HMA, is the state maintaining the capability to meet application timeframes and submitting complete project applications? [44 CFR §201.5(b)(2)(iii)(A)]</p> <p><u>Requirements for E6:</u></p> <p>a. <i>All applications and amendments are submitted by the end of each program's respective application period.</i></p> <p>b. <i>All applications are entered into FEMA's electronic data systems (such as, NEMIS and/or eGrants).</i></p> <p>c. <i>Eligibility and Completeness Checklist is prepared for all applications.</i></p> <p>d. <i>All applications are determined to be complete by FEMA within 90 days of submittal or selection for further review. Required environmental and historic preservation reviews and consultations will not be included in the 90-day review timeframe calculation.</i></p>	OT

**Enhanced State Mitigation Capability Validation
Summary of Findings Template (v. 031215)**

OT=on target; NOT=not on target		OT / NOT
<p>Comments: All applications and amendments have been submitted by the end of each program’s respective application period or approved extension period. The State enters and submits all applications & amendments into NEMIS for HMGP & eGrants for ND.</p> <p>ND: E&Cs are included with ND applications and all applications were determined complete well within the 90-day review timeframe. FY-15 FMA and PDM notification of selection was received 10/30/15. By 12/10/15 all project applications were deemed complete & forwarded to EHP & all planning applications were ready to award. FY-16 FMA and PDM applications were received on time and notification of selection was received 8/30/16. By 12/13/16 all project applications had been deemed complete & forwarded to EHP.</p> <p>HMGP: E&Cs are included with all PAS applications and all applications were determined complete within days of receipt and subsequently forwarded to EHP for review.</p>		
<p>V3. (E7.) With regard to HMA, is the state maintaining the capability to prepare and submit accurate environmental reviews and benefit-cost analyses? [44 CFR §201.5(b)(2)(iii)(B)⁴⁷]</p> <p><u>Requirements for E7:</u> <i>All applications and amendments are determined to be complete by FEMA within 90 days of submittal or selection for further review, including all data requested by FEMA to support Cost Effectiveness determinations and environmental/historic preservation compliance reviews. Required environmental and historic preservation reviews and consultations will not be included in the 90-day review timeframe calculation.</i></p>	OT	
<p>Comments: Florida’s Technical Unit prepares and submits complete EHP &HPA documentation. Rarely is an analysis or environmental package found to be in error or missing a piece of documentation. When this happens the State is very responsive and RFI’s have not gone beyond the informal first request.</p> <p>ND: no additional comment</p> <p>HMGP: no additional comment. Pas monitoring visits show no actionable issues. See attached monitoring reports.</p>		
<p>V4. (E8.) With regard to HMA, is the state maintaining the capability to submit complete and accurate quarterly progress and financial reports on time? [44 CFR §201.5(b)(2)(iii)(C)⁴⁸]</p> <p><u>Requirements for E8:</u></p> <ol style="list-style-type: none"> a. <i>All progress reports must be complete and submitted on time. Information in reports must accurately describe grant activities, including data related to the completion of individual property acquisitions. Incomplete progress reports that do not provide information on all open grants and subgrants or include all information required by the HMA Guidance are not considered on time.</i> b. <i>All Federal financial reports (FFR), Standard Form (SF) SF-425 are submitted on time. Information in reports must accurately describe grant activities, as described in the HMA Guidance.</i> c. <i>State consistently complies with the Financial Management Standard requirements described in 2 CFR §§200.300 to 200.309.</i> 	OT	
<p>Comments:</p> <p>ND: All ND progress and financial reports have been complete & submitted on time.</p> <p>HMGP: All HMGP progress and financial reports have been complete upon submittal. The State has requested and was granted one extension in this period. FL’s QPR Scorecard as of 12/31/15 was Timely, 100% for Data Completeness and 96% for Data Reasonableness/Accuracy/Questions. The QPR Scorecard for the State as of 03/31/16 was Timely, 100% for Data Completeness and 92% for Data Reasonableness/Accuracy/Questions.</p>		

**Enhanced State Mitigation Capability Validation
Summary of Findings Template (v. 031215)**

OT=on target; NOT=not on target	OT / NOT
<p>V5. (E9.) With regard to HMA, is the state maintaining the capability to complete HMA projects within established performance periods, including financial reconciliation? [44 CFR §201.5(b)(2)(iii)(D)⁴⁹]</p> <p><u>Requirements for E9:</u></p> <ol style="list-style-type: none"> a. All work as part of HMA subawards must be completed by the end of Period of Performance as described in the HMA Guidance. b. No major findings on last single audit obtained by the state related to HMA programs. For states without HMA grants, FEMA will review other Federal grants prepared by the responsible agency (such as state Emergency Management Agency). c. All grant close-out activities, including financial reconciliation, are completed within 90 days from the end of the performance period including: <ol style="list-style-type: none"> 1. Final FFR SF-425 and Performance Reports were submitted within 90 days from the end of the performance period unless an extension is granted by FEMA. 2. Statement submitted that approved Scope of Work and all environmental and historic preservation requirements have been satisfied. 3. SF-270 Request for Advance or Reimbursement or request to de-obligate funds is completed, if applicable due to cost underruns. 4. Other documentation as required in the HMA Guidance. 5. No late drawdowns are requested or performed after the liquidation period has ended. d. Actual expenditures have been documented and are consistent with SF-424A or SF-424C. 	OT
<p>Comments: FL's HMA subgrant POPs are often extended. The State of Florida has completed the projects within the performance periods or has requested extension within required timelines. Florida Emergency Management Agency has not had an audit finding since 2012. The State of Florida has performed within the required 90 day close-out period or requested administrative extensions in a timely fashion.</p> <p>ND: the State and FEMA have successfully closed 2 non-disaster grants in the review time period (8/25/15 – 8/24/16). See attached ND Closeout Tracker.</p> <p>HMGP: The State and FEMA have successfully closed 1 disaster grant (DR1595) in the review time period (8/25/15 – 8/24/16). Four more have been closed since; DR1545, DR1602 & DR1785 and DR1840. One recommendation would be to reconcile SMC with documentation more consistently.</p>	
Attachments	
<ol style="list-style-type: none"> 1) FL ND Closeout Tracker 07-18-17.xls 2) FL ND Review Status FY2015 06-28-17.xlsx 3) FL ND Review Status FY2016 06-28-17.xlsx 4) GMD FL Monitoring Visit & Report 03-31-16.pdf 5) GPD Audit Results 09-27-16.pdf 6) PAS Summary 07-03-17.docx 7) PAS Monitoring Report 09-15-16.docx 8) PAS Monitoring Report 09-17-15.docx 	



2017 Florida Mitigation Program Consultation
July 27, 2017 9:00 – 11:00 AM
SUMMARY

Attendees:

Florida

- Miles Anderson – State Hazard Mitigation Officer
- Kathleen Marshall (FDEM – Hazard Mitigation Grant Program)
- Jared Jaworski (FDEM – Hazard Mitigation Grant Program)
- Pamela Price (FDEM – Flood Mitigation Grant Program)
- Jason Pettus (FDEM – Hurricane Loss Mitigation Program)
- Steve Martin (FDEM – Floodplain Management and Insurance)
- Jerrick Saquibal (NFWFMD – Flood Mapping)
- Dawn Turner (SWFWMD – Flood Mapping)
- Kenneth Konyha (SFWMMD – Flood Protection Level of Service Program)
- Melissa Schloss (FDEM – Mitigation Planning)
- Laura Waterman (FDEM – Mitigation Planning)
- Amy Peterson (FDEM – Mitigation Planning)
- Shannon Riess (FDEM)

FEMA

- Jesse Munoz – Mitigation Division Director
- Jacky Bell - HMA Branch Chief
- Kristen Martinenza - Risk Analysis Branch Chief
- David Vandewater - Hazard Mitigation Assistance (HMA) Manager
- Gabriela Vigo - HMA co-lead for FL
- Victor Geer - HMA co-lead for FL
- Collis Brown - FMI Manager and FL Specialist
- Jason Hunter- FMI Manager and FL Specialist
- Chelsea Klein – Senior Environmental Protection Specialist
- Angelika Phillips - Environmental Protection Specialist
- Mariam Yousuf - Civil Engineer, RiskMAP
- Brenda Stirrup - Acting Mitigation Planning Lead
- Katy Goolsby-Brown- Dam Safety
- Bud Plisich - Building Science
- Kelly Reeves - Consultation Coordinator / Mitigation Planning
- Martin Erbele - Note taker / Resilience Action Partners

Florida Mitigation Program Consultation

SUMMARY

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[NOTE: Due to the focus and effort required for the Hurricane Irma response and recovery, the request for attendee review of this document has been delayed. This document will be replaced by a final version after participants have had a chance to review and comment.]

MITIGATION PROGRAM STRENGTHS

Enhanced Plan Update

State is working on each part of the State Plan Update step by step with multiple internal departments. Good progress is being made.

Floodplain Management and Insurance

- The CRS CAV Pilot Program has been successful. The program was initiated in 2015 to encourage and assist communities in enrolling the CRS Program. The state visited 208 communities in 2 years to introduce the CRS CAV-Pilot program. NFIP responsibilities and higher standards were discussed in-depth. 141 communities adopted the state model ordinance which is coordinated with the state building code. The State's Seven Performance Measures were also reviewed during the meetings. The Measures include a communication process with fuel and natural gas companies on anchoring tanks and with mechanical equipment companies on elevating their HVAC equipment. The counties are also provided floodplain permit application forms and ready-made letters and communication tools to engage partners to discuss the importance of sound floodplain management principles. The goal is to address common infractions. Even communities that are not interested in joining CRS view the Seven Performance Measures very positively and are interested in adopting these measures. The program and the Measures give local staff the 'backing' that the NFIP is important and worthwhile.
- CAV visits have been carefully tracked by the state to document the hours involved with each step in order to assist with FEMA efforts in refining the guidelines for estimating required timelines/funding for completing CAVs. The State will continue to review the return on investment for all these activities and provide solid evidence for what is required for these visits in light of funding reductions.
- The State floodplain management team is working with building codes to address the coastal construction control line. The purpose is to make it easier for local building staff to address building requirements in high hazard coastal areas.
- Training and publications – Three substantial damage courses were held in connection with the Hurricane Hermine and Matthew disasters. A post disaster toolkit was drafted to help local officials to understand their responsibilities. State is also updating their "Quick Guide" with ASCE/building codes updates and considering USB publications and well as printed versions depending on costs.

HMGP

- Currently, grants management is on track and going well, with 2 disasters closed to date in 2017 and 3 closed in 2016.
- PAS (Program Administration by State) - Four of twelve open disasters are being administered by the state under the PAS pilot, and the state is currently trying to include two additional disasters (DR 4280 and 4283: Hurricanes Hermine and Matthew) within the PAS pilot. For these

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two disasters, the state has developed a team to travel and conduct workshops, webinars, and local mitigation strategy meetings to share information in local jurisdictions. These workshops included an increased focus on mitigation with an open forum for discussion of projects. As a result, the state has seen an increase in applications, and communities are developing more ready-to-go projects for the next funding opportunity. The State feels that PAS has reduced redundancies and gets projects moving more quickly. [UPDATE: PAS agreements have been signed for DRs 4280 and 4283.]

PAS and Local Mitigation Plan Review

- 100% of Florida plans are approved currently.
- Florida has developed a local mitigation plan strategy manual.

Hurricane Loss Mitigation

- The Hurricane Loss Mitigation Program disperses \$2.8 million per year to localities and groups. 370 homes have been mitigated over the last 2 years. FDEM staff are working toward making the program a state funded mitigation organization, while being conscious to not overlap with the federal programs and to ensure positive cost/benefit values. The residential construction mitigation efforts are expanding from wind, to include water and other flood loss prevention methods.

Floodplain Mapping and Risk Map

- Northwest Florida Water Management District (NFWFMD) - Flood maps revisions for the Florida panhandle are almost complete; all but Bay County have had at least preliminary maps issued. New LiDAR is being incorporated and processed, which increases buy-in from communities. Local outreach is going well.
- Southwest Florida Water Management District (SWFWMD) – All 16 FIRMs under contract have been completed and resulted in digital FIRMS. The SWFWMD was the lead for 11 of the 16 county-wide projects, and FEMA or the affected County Governments were the lead for the other 5. The next focus will be on watershed plans, which will aid coordination, mitigation, and coastal surge work. New LiDAR has been flown in a few counties and more is planned.

Florida Dam Safety Program

- Dam Safety is a small unit within state and is dependent on FEMA funds for operations. Many functions are delegated to the Water Management Districts. The dam safety team's main activities are education, outreach, emergency action plans, and reminders. The state contains 1203 dams, which are defined to include levees; most are in the NE and NW portion of the state. Of these, approximately 80 are high hazard dams. A dam safety conference for dam owners is conducted annually. Trainings are done for the public as well as dam owners. The office manages a large amount of data and monitors storm systems to increase capacity as much as possible.

CHALLENGES TO ADVANCING MITIGATION

Florida Mitigation Program Consultation

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Floodplain Management and Insurance

- The state NFIP Program feels that the NFIP maps do not adequately address sea level rise and climate change, two hazards that Florida can no longer ignore. FEMA and the state need to look at these issues and start drafting ideas and solutions.
- Sinkholes have been a substantial hazard lately and will continue to be. Performing substantial damage determinations with this hazard has and will be an issue. For example, does work on soil stabilization that doesn't include the actual structure impact substantial damage calculations? The State requests guidance from Region IV on these substantial damage calculations.

Flood Mitigation Grant Program

- The state is concerned about procedural changes and new requirements to grants already submitted to Region IV. Gabriella will work with the state to make sure all procedures are as clear and as efficient as possible.
- Required EHP reviews have caused delays. The state has brought this up previously, and asks that that Region IV provide reasons for the delay or offer solutions to speed up reviews. State requests expedited review or priority status due to their PAS status. The State also wants to develop a pilot program to do state EHP reviews, and asks Region IV to help advance inquiries into using PAS in this way (acknowledged as a grey area). EHP explained that there are multiple tribal consultations, Fish and Wildlife service, marine issues, and other issues that must be considered. Programmatic agreements have been reviewed; but unless all partners participate, including Tribal nations, there remains a need for federal reviews. FEMA Region IV will investigate options and alternatives. [UPDATE: The State is requesting to be deemed a Non-Federal Representative for FEMA.]

Floodplain Mapping and Risk Map

- Northwest Florida Water Management District sees a need for more support with flood insurance at some of their outreach meetings, especially for condos and other more complex situations. Additional insurance specialist or on-call support would be helpful because there are always a lot of questions on the insurance side.

Florida Dam Safety Program

- The program relies heavily on dam owners for maintenance and operations since there isn't a lot of strict regulations on dams. Bud noted that levees and dams are not created equally, because high hazard dams are built to handle a much higher flood standard than levees. Florida tracks emergency action plans for high hazard dams, cannot force them to have a plan.

OPPORTUNITIES FOR IMPROVEMENTS AND NEXT STEPS

- State-earned credit points in CRS - The state has requested information from FEMA Headquarters about what CRS points could be credited toward communities based on the state model flood ordinance. No response has been received, and the state requests help from Region IV. Jesse Munoz will pursue this. [UPDATE: A response was provided in a letter from William Lesser, FIMA CRS Coordinator, on 8/16/17]

Florida Mitigation Program Consultation

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- The state realizes the need for more public outreach between the Letter of Final Determination (LFD) and new map's Effective dates. Assistance on strategy and tools is needed from FEMA (at a regional and national level). The state wants to support development of a strategy and requests funding, subject matter experts, and support. Region IV Risk Analysis Branch will follow-up.
- Since the state's Model Floodplain Ordinance is compliant, the state is interested to know if it could be empowered to approve ordinance updates during RiskMAP.
- Florida identified a gap in communicating to Region IV FMI staff about when local meetings will be occurring. Going forward, regional staff will be copied on notices.
- The state requests that results from both FEMA and state-led CAVs to be uploaded in CIS.
- The issue of Public Restrooms in Special Flood Hazard Areas (for example, on beaches) remains a concern. The State intends to move forward looking for solutions.
- Region-wide NFIP Retreat - Region IV has 50% of NFIP policies; and at the last PiM meeting, all states requested a Region IV NFIP retreat for states to share information. Florida strongly supports that type of retreat and feels strongly that it should be funded as a separate event rather than as a couple hours set aside during the next PiM. FEMA Region IV leadership offered to bring this to FEMA Headquarters attention.
- More information and training on CAP-SSSE would be helpful to the state.