

APPENDIX B:

LOCAL MITIGATION PLAN REVIEW TOOL

The *Local Mitigation Plan Review Tool* 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 community.

- The Regulation Checklist provides a summary of FEMA’s evaluation of whether the Plan has addressed all requirements.
- The Plan Assessment identifies the plan’s strengths as well as documents areas for future improvement.
- The Multi-jurisdiction Summary Sheet is an optional worksheet that can be used to document how each jurisdiction met the requirements of each Element of the Plan (Planning Process; Hazard Identification and Risk Assessment; Mitigation Strategy; Plan Review, Evaluation, and Implementation; and Plan Adoption).

The FEMA Mitigation Planner must reference this *Local Mitigation Plan Review Guide* when completing the *Local Mitigation Plan Review Tool*.

Jurisdiction: Mifflin County	Title of Plan: Mifflin County 2019 MJHMP	Date of Plan: January 6, 2020
Local Point of Contact: William A. Gomes	Address:	
Title:		
Agency:		
Phone Number:		

State Reviewer: Ernest Szabo	Title: State HM Planner	Date:
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FEMA Reviewer: Matt McCullough	Title: Community Planner	Date:
Date Received in FEMA Region (insert #)		
Plan Not Approved		
Plan Approvable Pending Adoption		
Plan Approved		

**SECTION 1:
REGULATION CHECKLIST**

INSTRUCTIONS: The Regulation Checklist must be completed by FEMA. 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.’ The ‘Required Revisions’ summary at the bottom of each Element must be completed by FEMA to provide a clear explanation of the revisions that are required for plan approval. Required revisions must be explained for each plan sub-element that is ‘Not Met.’ Sub-elements should be referenced in each summary by using the appropriate numbers (A1, B3, etc.), where applicable. Requirements for each Element and sub-element are described in detail in this *Plan Review Guide* in Section 4, Regulation Checklist.

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
ELEMENT A. PLANNING PROCESS				
A1. Does the Plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction? (Requirement §201.6(c)(1))	Pg. 17-27 & Appendix C	X		
A2. Does the Plan document an opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, agencies that have the authority to regulate development as well as other interests to be involved in the planning process? (Requirement §201.6(b)(2))	Pg. 18-20 & Appendix C	X		
A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))	Pg. 24-26 & Appendix C	X		
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))	Pg. 2-3, 16, 207-223	X		
A5. Is there discussion of how the community(ies) will continue public participation in the plan maintenance process? (Requirement §201.6(c)(4)(iii))	Pg. 287	X		
A6. Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a 5-year cycle)? (Requirement §201.6(c)(4)(i))	Pg. 273-286	X		

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
<u>ELEMENT A: REQUIRED REVISIONS</u>				
A2.) Kudos: The invitation and attendance by neighboring jurisdictions and outside agencies is acknowledged. Rarely is it seen that invitations to these entities are accepted and then attended. Well done!				
A6.) Recommended Revision: As noted on pg. 271. "Completed actions should be accompanied by an assessment of how effective those actions were in mitigating losses both quantitatively and qualitatively". Please provide example questions or assessment criteria for the communities to evaluate their action's effectiveness. In response to required revision A6, text was added to Section 7.2, p. 272-273 of the MJHMP. This additional text serves as an example to demonstrate how a specific action's effectiveness would be evaluated by a community within Mifflin County.				
ELEMENT B. HAZARD IDENTIFICATION AND RISK ASSESSMENT				
B1. Does the Plan include a description of the type, location, and extent of all natural hazards that can affect each jurisdiction(s)? (Requirement §201.6(c)(2)(i))	Pg. 39-188	X		
B2. Does the Plan include information on previous occurrences of hazard events and on the probability of future hazard events for each jurisdiction? (Requirement §201.6(c)(2)(i))	Pg. 39-188	X		
B3. Is there a description of each identified hazard's impact on the community as well as an overall summary of the community's vulnerability for each jurisdiction? (Requirement §201.6(c)(2)(ii))	Pg. 39-188	X		
B4. Does the Plan address NFIP insured structures within the jurisdiction that have been repetitively damaged by floods? (Requirement §201.6(c)(2)(ii))	Pg. 68	X		

ELEMENT B: REQUIRED REVISIONS

Required Revision:

B1.) Pg. 76-77 Please remove the listing of Tax Delinquent Properties in Mifflin County, or at the very minimum remove the addresses from the list. This PII information is not advised to be placed in the publicly available copy of the plan.

As per the FEMA HMP Review call the decision was left up to the County whether to remove this information completely or to move it to a redacted appendix. The County decided it would be best to move the maps of the two tax delinquent properties (Figure 4.3.3-6 and 4.3.3-7) and Table 4.3.3-10, which contains addresses of tax delinquent properties, to Appendix D (See p. D-1-D-4).

In response to required revision B1, Appendix D has been renamed Critical Facilities and Tax Delinquent Properties. Please note that Appendix D is marked NOT FOR PUBLIC DISTRIBUTION.

B2.) Note:

Pg. 52- Table 4.3.2-2: Since 1950 there have only been 5 occurrences of an Extreme Temperature Event? The NCEI Storm Events Database was used to compile this occurrence data on extreme temperature events in Mifflin County (See Section 4.3.2.3, p. 52).

The database was revisited on December 3, 2019 and it was confirmed that there are five documented occurrences of extreme temperature events for Mifflin County. During the FEMA HMP Review call this was deemed satisfactory with FEMA.

B2.) Recommended Revision:

Pg. 99- Landslide: What locations were given in the anecdotal information from communities noted on this page? Due to the state not having a comprehensive list of incidents, this plan could serve as the opportunity to begin building one for Mifflin County.

In response to recommended revision B2, Action 52 (Section 6.4, p. 263) was added to the MJHMP text.

A PennDOT study analyzing landslide vulnerability and risk assessment in western Pennsylvania was made available for reference. This would be a great study to utilize to assess future landslide vulnerability for Mifflin County.

FEMA found the above referenced study to be a very valuable addition to the landslide profile for future use in the Mifflin County MJHMP.

B3.) Recommended Revision:

Pg. 55- Section 4.3.2.5: Include estimates of numbers for these vulnerable groups for each municipality as part of the assessment. This can aid in the prioritization of outreach activities to these populations.

During the discussion with FEMA, it was decided that this recommended revision will be utilized for the next Mifflin County MJHMP update. Demographic data to assess vulnerability will be identified early in the update process.

B3.) Discussion:

Pg. 26- Flood: How was data/mapping or GIS risk-based product (referenced on pg. 26) used to inform the risk assessment conversation with plan participants (steering committee members and stakeholders) during the February 26th meeting? This is not indicated in the agenda, power point or summary. Pg. 74 (Table 4.3.3-8) provides a lot of content to work with.

In response to FEMA's discussion comment, it was decided that no action was needed for the current MJHMP plan, however, future MJHMP plan updates will identify specific properties within a protected annex that are vital to the community.

1. REGULATION CHECKLIST	Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)			
B3.) Required Revision:			
Pg. 99- Landslide: Please provide the potentially impacted transportation route as part of your vulnerability assessment. Overlaying the slope map on pg. 100 and transportation routes could be performed to gain an understanding of potential risk.			
In response to required revision B3, the map of slopes within Mifflin County was overlaid with major transportation routes to assess landslide risk and vulnerability within the County (See Section 4.3.6.5, Figure 4.3.6-3, p.97).			
In addition to providing a transportation route vulnerability analysis to landslide activity, a PennDOT study analyzing landslide vulnerability and risk assessment in western Pennsylvania was also incorporated into the landslide hazard profile (See Section 4.3.6.4, p. 95-96).			
Pg. 99- Discussion:			
What information within the first full paragraph on Pg. 99 is being cited from Michael Baker International, 2018?			
The reference within the MJHMP text was updated to provide additional clarification (See Section 4.3.6.2, p. 95).			
B3.) Required Revision:			
Pg. 122- Subsidence/Sinkhole: What are the affiliated structural/infrastructure risks to the communities within identified Karst Feature Occurrences on Table 4.3.10-1? Please provide the potential losses to these communities given the hazard event. Are there structures close to existing instances that could be at-risk? Are there are critical facilities noted in Appendix D within close proximity?			
In response to required revision B3, an analysis was completed using Critical Facilities within Mifflin County to assess the vulnerability of these Critical Facilities to sinkholes and karst areas. This information was documented in Section 4.3.10.5 in Table 4.3.10-2 and incorporated into the Subsidence/Sinkhole hazard profile within the MJHMP text (p. 119-120).			
B3.) Recommended Revision:			
Pg. 131- Wildfire: Are there any costs associated with the events noted in Table 4.3.12-1?			
In response to the recommended revision, the shapefile obtained from the U.S. Forest Service displaying wildfire occurrence data was revisited, and it was confirmed that cost data was not included within the attribute table (See Section 4.3.12.3, Table 4.3.12-1, p. 129). This was deemed satisfactory for FEMA.			
B1 & B3.) Discussion:			
Were you able to acquire inundation mapping for any of the dams noted in the plan?			
During the discussion with FEMA, it was agreed that the inundation mapping would not be included within the Mifflin County MJHMP. This information is no longer digitized for the state of Pennsylvania, and it is highly protected information. However, County Emergency Managers are authorized to this information at the local level.			
ELEMENT C. MITIGATION STRATEGY			
C1. Does the plan document each jurisdiction's existing authorities, policies, programs and resources and its ability to expand on and improve these existing policies and programs? (Requirement §201.6(c)(3))	Pg. 207-234	X	

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
C2. Does the Plan address each jurisdiction's participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement §201.6(c)(3)(ii))	Pg. 214-220 & Appendix C	X		
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))	Pg. 247-248	X		
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 §201.6(c)(3)(ii))	Pg. 251-263	X		
C5. Does the Plan contain an action plan that describes how the actions identified will be prioritized (including cost benefit review), implemented, and administered by each jurisdiction? (Requirement §201.6(c)(3)(iv)); (Requirement §201.6(c)(3)(iii))	Pg. 264	X		
C6. Does the Plan describe a process by which local governments will integrate the requirements of the mitigation plan into other planning mechanisms, such as comprehensive or capital improvement plans, when appropriate? (Requirement §201.6(c)(4)(ii))	Pg. 234-242	X		

ELEMENT C: REQUIRED REVISIONS

C3.) Discussion

Appendix C- The NFIP Compliance and Capabilities questionnaire differs from the existing one developed by FEMA. This obviously does not have to be used to complete the requirement. Curious as to why this separate one was developed.

The NFIP questionnaire/checklist was circulating in 2012-13 as a best practice and was incorporated into PEMA's Pennsylvania HMP Standard Operating Guide (SOG). Simultaneously, the National FEMA Local Mitigation Planning Handbook was in development to be published in 2013 and it appears the NFIP questionnaire/checklist was incorporated as a best practice into this handbook as well.

During discussion with FEMA, it was determined that FEMA requirements will allow for continued use of this NFIP Compliance and Capabilities questionnaire.

C4.) Required Revision:

Pg. 252- Each municipality must have an action explicated applied to each hazard type connected to them in the risk assessment. I.e. - Pg. 252- Neither Armagh Township or Brown Township have an identified action for Subsidence/Sinkholes yet were called out specifically in the risk assessment (Pg. 121-Section 4.3.10.3.)

We reviewed the community-based risk for the high hazards and considered the stated desires of the municipalities during the MJHMP update process. New Action 37 (Section 6.4, p. 259) was added for those municipalities with floodplain ordinances. New Action 38 (Section 6.4, p. 259) was added for Armagh Township and Brown Township for the Subsidence/Sinkhole hazard. New Action 40 (Section 6.4, p. 260) was added for Juniata Terrace Borough for the Winter Storm hazard. New Action 42 (Section 6.4, p. 260) was added for Juniata Terrace Borough and Menno Township for the Wildfire hazard. In addition, Action 44 (Section 6.4, p. 261) was already included in the MJHMP to specifically address municipalities with publicly owned forests for the Wildfire and Invasive Species hazards. Action 45 (Section 6.4, p. 261) was updated specifically for Brown Township, Lewistown Borough, and Union Township for the Radon hazard.

C4.) Required Revision:

Please develop and place an action into the strategy that addresses new construction in identified hazard areas.

In response to required revision C4, Action 37 (Section 6.4, p. 259) was added to the MJHMP.

C4.) Required Revision:

Please provide an action that specifically addresses the following hazards: Landslide, Lightning Strike, Radon, Tornado/High Wind. These are not distinctly noted in the mitigation strategy.

In response to required revision C4, Actions 45-46 (Section 6.4, p. 261-262) were revised (radon & all hazards with drowning, invasive species, drought, and emergency preparedness called out). Also, new Action 52 for the Landslide hazard (Section 6.4, p. 263), new Action 53 for the Lightning Strike hazard (Section 6.4, p. 263), and new Action 54 for the Flash Flood, Tornado, and Windstorm hazards (Section 6.4, p. 263) were incorporated into the MJHMP.

C4.) Discussion:

Pg. 259- High Hazard Potential Dams: Will need to have a separate conversation about requirements for this grant activity. I have not reviewed this plan for the information/ materials needed to meet this new grant requirement. I will prepare for that conversation and we can reconvene.

FEMA will fill out the Plan Review Tool for the High Hazard Potential Dams specifically. FEMA will then provide this information to PEMA, so that Mifflin County may meet the grant requirement.

C5.) Required Revision:

Pg. 263- Please include language that states specifically a "cost-benefit review" as part of the prioritization.

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
In response to required revision C5, language describing how cost-benefit is considered as part of the mitigation action prioritization evaluation was added to the Multi-Objective Mitigation Action Prioritization description in Section 6.4, p. 264 of the MJHMP text.				
ELEMENT D. PLAN REVIEW, EVALUATION, AND IMPLEMENTATION (applicable to plan updates only)				
D1. Was the plan revised to reflect changes in development? (Requirement §201.6(d)(3))	Pg. 14-15, 197-198	X		
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))	Pg. 243-244	X		
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))	Pg. 245-248	X		
<u>ELEMENT D: REQUIRED REVISIONS</u>				
D2.) Required Revision: Please provide an update (completed, deleted, deferred, ongoing, delayed, etc.....) for each action from the previous plan. In response to required revision D2, the following sentence was added to the MJHMP text (Section 6.1, p. 244): "All actions going forward have a clear agency and clear responsibility."				
ELEMENT E. PLAN ADOPTION				
E1. Does the Plan include documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval? (Requirement §201.6(c)(5))	N/A			
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))	N/A			
<u>ELEMENT E: REQUIRED REVISIONS</u>				
ELEMENT F. ADDITIONAL STATE REQUIREMENTS (OPTIONAL FOR STATE REVIEWERS ONLY; NOT TO BE COMPLETED BY FEMA)				
F1.				
F2.				
<u>ELEMENT F: REQUIRED REVISIONS</u>				

SECTION 2: PLAN ASSESSMENT

INSTRUCTIONS: The purpose of the Plan Assessment is to offer the local community more comprehensive feedback to the community on the quality and utility of the plan in a narrative format. The audience for the Plan Assessment is not only the plan developer/local community planner, but also elected officials, local departments and agencies, and others involved in implementing the Local Mitigation Plan. The Plan Assessment must be completed by FEMA. The Assessment is an opportunity for FEMA to provide feedback and information to the community on: 1) suggested improvements to the Plan; 2) specific sections in the Plan where the community has gone above and beyond minimum requirements; 3) recommendations for plan implementation; and 4) ongoing partnership(s) and information on other FEMA programs, specifically RiskMAP and Hazard Mitigation Assistance programs. The Plan Assessment is divided into two sections:

1. Plan Strengths and Opportunities for Improvement
2. Resources for Implementing Your Approved Plan

Plan Strengths and Opportunities for Improvement is organized according to the plan Elements listed in the Regulation Checklist. Each Element includes a series of italicized bulleted items that are suggested topics for consideration while evaluating plans, but it is not intended to be a comprehensive list. FEMA Mitigation Planners are not required to answer each bullet item, and should use them as a guide to paraphrase their own written assessment (2-3 sentences) of each Element.

The Plan Assessment must not reiterate the required revisions from the Regulation Checklist or be regulatory in nature, and should be open-ended and to provide the community with suggestions for improvements or recommended revisions. The recommended revisions are suggestions for improvement and are not required to be made for the Plan to meet Federal regulatory requirements. The italicized text should be deleted once FEMA has added comments regarding strengths of the plan and potential improvements for future plan revisions. It is recommended that the Plan Assessment be a short synopsis of the overall strengths and weaknesses of the Plan (no longer than two pages), rather than a complete recap section by section.

Resources for Implementing Your Approved Plan provides a place for FEMA to offer information, data sources and general suggestions on the overall plan implementation and maintenance process. Information on other possible sources of assistance including, but not limited to, existing publications, grant funding or training opportunities, can be provided. States may add state and local resources, if available.

A. Plan Strengths and Opportunities for Improvement

This section provides a discussion of the strengths of the plan document and identifies areas where these could be improved beyond minimum requirements.

Element A: Planning Process

How does the Plan go above and beyond minimum requirements to document the planning process with respect to:

- *Involvement of stakeholders (elected officials/decision makers, plan implementers, business owners, academic institutions, utility companies, water/sanitation districts, etc.);*
- *Involvement of Planning, Emergency Management, Public Works Departments or other planning agencies (i.e., regional planning councils);*
- *Diverse methods of participation (meetings, surveys, online, etc.); and*
- *Reflective of an open and inclusive public involvement process.*

Element B: Hazard Identification and Risk Assessment

In addition to the requirements listed in the Regulation Checklist, 44 CFR 201.6 Local Mitigation Plans identifies additional elements that should be included as part of a plan's risk assessment. The plan should describe vulnerability in terms of:

- 1) *A general description of land uses and future development trends within the community so that mitigation options can be considered in future land use decisions;*
- 2) *The types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard areas; and*
- 3) *A description of potential dollar losses to vulnerable structures, and a description of the methodology used to prepare the estimate.*

How does the Plan go above and beyond minimum requirements to document the Hazard Identification and Risk Assessment with respect to:

- *Use of best available data (flood maps, HAZUS, flood studies) to describe significant hazards;*
- *Communication of risk on people, property, and infrastructure to the public (through tables, charts, maps, photos, etc.);*
- *Incorporation of techniques and methodologies to estimate dollar losses to vulnerable structures;*
- *Incorporation of Risk MAP products (i.e., depth grids, Flood Risk Report, Changes Since Last FIRM, Areas of Mitigation Interest, etc.); and*
- *Identification of any data gaps that can be filled as new data became available.*

Element C: Mitigation Strategy

How does the Plan go above and beyond minimum requirements to document the Mitigation Strategy with respect to:

- *Key problems identified in, and linkages to, the vulnerability assessment;*
- *Serving as a blueprint for reducing potential losses identified in the Hazard Identification and Risk Assessment;*
- *Plan content flow from the risk assessment (problem identification) to goal setting to mitigation action development;*
- *An understanding of mitigation principles (diversity of actions that include structural projects, preventative measures, outreach activities, property protection measures, post-disaster actions, etc);*
- *Specific mitigation actions for each participating jurisdictions that reflects their unique risks and capabilities;*
- *Integration of mitigation actions with existing local authorities, policies, programs, and resources; and*
- *Discussion of existing programs (including the NFIP), plans, and policies that could be used to implement mitigation, as well as document past projects.*

Element D: Plan Update, Evaluation, and Implementation (Plan Updates Only)

How does the Plan go above and beyond minimum requirements to document the 5-year Evaluation and Implementation measures with respect to:

- *Status of previously recommended mitigation actions;*
- *Identification of barriers or obstacles to successful implementation or completion of mitigation actions, along with possible solutions for overcoming risk;*
- *Documentation of annual reviews and committee involvement;*
- *Identification of a lead person to take ownership of, and champion the Plan;*
- *Reducing risks from natural hazards and serving as a guide for decisions makers as they commit resources to reducing the effects of natural hazards;*
- *An approach to evaluating future conditions (i.e. socio-economic, environmental, demographic, change in built environment etc.);*
- *Discussion of how changing conditions and opportunities could impact community resilience in the long term; and*
- *Discussion of how the mitigation goals and actions support the long-term community vision for increased resilience.*

B. Resources for Implementing Your Approved Plan

Ideas may be offered on moving the mitigation plan forward and continuing the relationship with key mitigation stakeholders such as the following:

- *What FEMA assistance (funding) programs are available (for example, Hazard Mitigation Assistance (HMA)) to the jurisdiction(s) to assist with implementing the mitigation actions?*
- *What other Federal programs (National Flood Insurance Program (NFIP), Community Rating System (CRS), Risk MAP, etc.) may provide assistance for mitigation activities?*
- *What publications, technical guidance or other resources are available to the jurisdiction(s) relevant to the identified mitigation actions?*
- *Are there upcoming trainings/workshops (Benefit-Cost Analysis (BCA), HMA, etc.) to assist the jurisdictions(s)?*
- *What mitigation actions can be funded by other Federal agencies (for example, U.S. Forest Service, National Oceanic and Atmospheric Administration (NOAA), Environmental Protection Agency (EPA) Smart Growth, Housing and Urban Development (HUD) Sustainable Communities, etc.) and/or state and local agencies?*

**SECTION 3:
MULTI-JURISDICTION SUMMARY SHEET (OPTIONAL)**

INSTRUCTIONS: For multi-jurisdictional plans, a Multi-jurisdiction Summary Spreadsheet may be completed by listing each participating jurisdiction, which required Elements for each jurisdiction were ‘Met’ or ‘Not Met,’ and when the adoption resolutions were received. This Summary Sheet does not imply that a mini-plan be developed for each jurisdiction; it should be used as an optional worksheet to ensure that each jurisdiction participating in the Plan has been documented and has met the requirements for those Elements (A through E).

MULTI-JURISDICTION SUMMARY SHEET												
#	Jurisdiction Name	Jurisdiction Type (city/borough/ township/ village, etc.)	Plan POC	Mailing Address	Email	Phone	Requirements Met (Y/N)					
							A. Planning Process	B. Hazard Identification & Risk Assessment	C. Mitigation Strategy	D. Plan Review, Evaluation & Implementation	E. Plan Adoption	F. State Requirements
1												
2												
3												
4												
5												
6												
7												
8												

MULTI-JURISDICTION SUMMARY SHEET

#	Jurisdiction Name	Jurisdiction Type (city/borough/ township/ village, etc.)	Plan POC	Mailing Address	Email	Phone	Requirements Met (Y/N)					
							A. Planning Process	B. Hazard Identification & Risk Assessment	C. Mitigation Strategy	D. Plan Review, Evaluation & Implementation	E. Plan Adoption	F. State Requirements
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