

Hazard Mitigation and CRS

How to Maximize Community Rating System credits for your Local Hazard Mitigation

CRS Integration into a LHMP

FEMA has two major hazard mitigation planning programs: local multi-hazard mitigation planning and floodplain management planning under the Community Rating System (CRS). In most cases, doing a thorough job of mitigation planning will result in more credit under Activity 510 of CRS (Floodplain Management Planning). As of May 2018, 99 percent of CRS communities also have a local hazard mitigation plan (LHMP). This handout is designed to help communities integrate mitigation planning and CRS planning to produce more effective local flood mitigation actions and to meet the criteria of both FEMA programs more efficiently.

This handout summarizes the similarities between LHMP elements and the CRS steps, and highlights key differences that are commonly overlooked.

(See FEMA's [Mitigation Planning and the Community Rating System Key Topics Bulletin](#) for more detailed information)

While there are a lot of similarities between mitigation planning and CRS planning, mitigation planners should be aware of some special criteria for the CRS credits. This handout was designed to help a person preparing an LHMP who wishes to include elements to also receive CRS credit. This handout takes each LHMP element and provides the corresponding CRS step; summarizes the details of the CRS step; and calls out prerequisites, key differences between CRS and LHMP review criteria, how to maximize CRS points, and highlights commonly missed elements in callout boxes throughout this handout. Additionally, there is one overarching difference between LHMP and CRS requirements:

- LHMP elements are either met or not met, whereas CRS steps are points-based. Many CRS steps have minimum criteria, but a community earns more points for additional activities.
 - While CRS requirements are points-based, **note that the planning process must address all 10 CRS steps at a minimum level; completely omitting one of the CRS steps could result in no CRS credit or credit capped at 50 points¹.**

LHMP Planning Element	CRS Counterpart	CRS Step Details
ELEMENT A. PLANNING PROCESS		
A1. Document the planning process	Step 1. Organize to prepare the Plan	<p>Prerequisites:</p> <ul style="list-style-type: none"> • CRS requires a Floodplain Management Plan (FMP) committee. <p>Key Differences:</p> <ul style="list-style-type: none"> • The FMP committee can be the LHMP planning committee or can be a separate FMP committee that focuses on flooding. • The FMP committee must meet at least five times. • Multi-jurisdictional plans, each community that wants to earn CRS points must have two staff representatives on the FMP committee.

Commonly Missed: The composition of a typical LHMP planning committee is different from CRS requirements. CRS requirements are more specific; you cannot go back and “fix” this at the end.

¹ If one step is missing from a FEMA-approved hazard mitigation plan, the plan may receive CRS credit, but it is limited to 50 points. If two steps are missing, there is no CRS credit given.

LHMP Planning Element	CRS Counterpart	CRS Step Details
		<ul style="list-style-type: none"> At least half of the representatives must attend all meetings of the FMP committee. <p>Maximize Points:</p> <ul style="list-style-type: none"> Involve staff from multiple departments. One point is provided for each office represented; full credit is given for staff representing all six categories of CRS flood mitigation activities (see Table 1 below). Formally establish the planning process.
<p>A3. Public involvement during the planning process</p>	<p>Step 2. Involve the public</p>	<p>Prerequisites:</p> <ul style="list-style-type: none"> CRS requires a Public Planning committee, which can be also be the LHMP stakeholder group. <p>Key Differences:</p> <ul style="list-style-type: none"> An LHMP requires the opportunity for stakeholders to participate; CRS requires active stakeholder participation. <p>Maximize Points:</p> <ul style="list-style-type: none"> Full credit is given if at least half the committee members are from outside the local government. At least one public information meeting is held in the affected area(s) within the first two months of the planning process (separate from the planning committee meetings). Hold at least one public meeting to obtain input on the recommended plan. Five points is given for each additional public information activity that explains the planning process and encourages input. <div data-bbox="1084 655 1503 869" style="background-color: #4a7ebb; color: white; padding: 5px;"> <p>Commonly Missed: CRS's definition of stakeholder/public involvement is more structured than what is provided in the local mitigation plan guidance.</p> </div>
<p>A4. Review and incorporation of existing plans, studies, reports, and technical information</p>	<p>Step 3 (a). Review existing studies</p>	<p>Prerequisites:</p> <ul style="list-style-type: none"> This is essentially the same as sub-element A4: <ul style="list-style-type: none"> Review existing studies, reports, and technical information and the community's needs, goals, and plans for the area.
<p>A2. An opportunity for neighboring communities, local and regional agencies to be involved</p>	<p>Step 3 (b). Coordinate with agencies and organizations</p>	<p>Key Differences:</p> <ul style="list-style-type: none"> This is similar to sub-element A2, but it requires more than providing an opportunity for involvement. <p>Maximize Points:</p> <ul style="list-style-type: none"> Coordinate with agencies and organizations outside the community's governmental structure. <div data-bbox="1084 1423 1503 1703" style="background-color: #4a7ebb; color: white; padding: 5px;"> <p>Commonly Missed: In addition to contacting the various agencies and organizations outside the community's government structure, planning staff must document the contacts made and their responses.</p> </div>
<p>A5. Continued public participation</p>	<p>Step 10. Implement</p>	<p>Prerequisites:</p> <ul style="list-style-type: none"> Progress must be evaluated at least annually.

LHMP Planning Element	CRS Counterpart	CRS Step Details
<p>A6. Monitoring, evaluating and updating the mitigation plan within a 5-year cycle</p>	<p>evaluate, and revise</p>	<ul style="list-style-type: none"> - The procedures for doing this must be explained in the plan document. The evaluation report must be made available to the media and the public. - An evaluation report must be prepared, distributed to the governing body, the media, and the public, and submitted to the Insurance Services Office, Inc. (ISO) with the community’s recertification package. • The plan must be updated every 5 years. <p>Key Differences:</p> <ul style="list-style-type: none"> • An LHMP requires you to discuss the evaluation process; CRS requires proof that evaluation occurred yearly. <p>Maximize Points:</p> <ul style="list-style-type: none"> • To encourage continued public involvement, additional points are provided for having the evaluation report prepared by the CRS Step 2(a) planning committee. • More points are provided for more frequent committee meetings during the year to review progress. <div data-bbox="1084 495 1503 613" style="border: 1px solid black; background-color: #4a7ebb; color: white; padding: 5px; text-align: center;"> <p>Commonly Missed: Proof that evaluation occurred yearly must be included in the plan.</p> </div>
ELEMENT B. HAZARD IDENTIFICATION AND RISK ASSESSMENT		
<p>B1. Hazard profile</p>	<p>Step 4. Assess the hazard</p>	<p>Prerequisites:</p> <ul style="list-style-type: none"> • The flood hazard assessment must include: <ul style="list-style-type: none"> - The Special Flood Hazard Area shown on the Flood Insurance Rate Map (FIRM); - All repetitive loss areas (CRS communities should have already prepared repetitive loss area maps); - Areas not mapped on the FIRM that have flooded in the past (flood insurance claims can help with this); and - Other surface flooding identified in other studies. <p>Key Differences:</p> <ul style="list-style-type: none"> • Most LHMPs sufficiently cover the minimum requirement. Providing more details is an opportunity to obtain additional points. <p>Maximize Points:</p> <ul style="list-style-type: none"> • Include the following: discussion of less frequent flooding, areas likely to flood, and other natural hazards.
<p>B3. Hazard impact and vulnerability assessment</p>	<p>Step 5. Assess the problem</p>	<p>Prerequisites:</p> <ul style="list-style-type: none"> • An overall summary of the jurisdiction’s vulnerability to each hazard and the impact (the base criteria are essentially the same as those for sub-element B3). • Repetitive loss communities must: <ul style="list-style-type: none"> - Include their repetitive loss areas. - Describe the causes of repetitive flooding. - Send an annual mailer with information on ways to protect properties from the repetitive flooding. <p>Key Differences:</p> <ul style="list-style-type: none"> • Most LHMPs sufficiently cover the minimum requirement, providing more detail is an opportunity to obtain additional points. <p>Maximize Points:</p> <ul style="list-style-type: none"> • Provide additional details beyond the overall summary. <ul style="list-style-type: none"> - The impact of flooding on various community attributes; - Historical damage to buildings; - The area’s natural floodplain functions;
<p>B4. National Flood Insurance Program (NFIP) repetitive loss properties</p>		

LHMP Planning Element	CRS Counterpart	CRS Step Details
		<ul style="list-style-type: none"> - Future development and redevelopment; and - Future flooding conditions due to climate change.
ELEMENT C. MITIGATION STRATEGY		
C3. Mitigation goals	Step 6. Set goals	<p>Prerequisites:</p> <ul style="list-style-type: none"> • This is essentially the same as sub-element C3: set mitigation goals.
C1. Capability assessment	Step 7. Review possible activities	<p>Prerequisites:</p> <ul style="list-style-type: none"> • Review/consider preventive activities. • The plan needs to include a discussion of what was examined and why certain actions were recommended. <p>Key Differences:</p> <ul style="list-style-type: none"> • When describing your mitigation strategy, you MUST describe the actions that were considered, the actions that were chosen, and your reasoning for choosing some actions over others. • Mitigation planning and CRS have lists of six types of mitigation actions/activities, but these lists differ. See Table 1 below. <p>Maximize Points:</p> <ul style="list-style-type: none"> • Review whether the community's floodplain management regulatory standards are sufficient for current and future conditions, as discussed under CRS Steps 4 and 5. • More points are given for reviewing multiple categories of flood mitigation measures. Full credit is provided if measures from all six flood mitigation categories (see Table 1 below) are identified and discussed.
C2. NFIP participation and compliance		
C4. Mitigation strategy		
C5. Mitigation prioritization	Step 8. Draft an action plan	<p>Prerequisites:</p> <ul style="list-style-type: none"> • There must be an action item for each goal listed in CRS Step 6. • Actions must be prioritized. <p>Key Differences:</p> <ul style="list-style-type: none"> • CRS steps are more specific than the LHMP requirements. <p>Maximize Points:</p> <ul style="list-style-type: none"> • Full credit is provided for an action plan with actions in five of the six flood mitigation categories. • Additional credit is offered for including policies and procedures for post-disaster redevelopment and mitigation in the action plan, as well as for action items that mitigate the effects of other natural hazards.
C6. Integration of the LHMP		
ELEMENT D. PLAN REVIEW, EVALUATION, AND IMPLEMENTATION (applicable to plan updates only)		
D1. Changes in development	Step 10. Implement, evaluate, and revise	<ul style="list-style-type: none"> • Specific requirements for certain steps dovetail with those of sub-elements D1, D2, and D3. Adequately addressing CRS Steps 4, 5, 6, and 7 will meet the requirements of D1, D2, and D3.
D2. Mitigation strategy progress		
D3. Changes in priorities		
ELEMENT E. PLAN ADOPTION		

Commonly Missed:
 Missing CRS Step 7 is the most common reason that FEMA-approved mitigation plans are capped at 50 CRS points. Many hazard mitigation plans omit this discussion. The planning staff may have conducted such a review, but for CRS credit, the plan document must describe the review. Omitting the review pieces of your process results in no credit for CRS Step 7.

Commonly Missed: Mitigation actions need to be tied to goals and every goal needs at least one action associated to it.

LHMP Planning Element	CRS Counterpart	CRS Step Details
E1. Plan adoption	Step 9. Adopt the plan	<p>Prerequisites:</p> <ul style="list-style-type: none"> Adoption must be in the form of a resolution or other formal document that is voted on by the community's governing body.
E2. Multi-jurisdictional plans – plan adoption by each participant		<p>Key Differences:</p> <ul style="list-style-type: none"> Most LHMPs are adopted through formal documentation, but other forms of adoption are allowed for LHMPs. <p>Maximize Points:</p> <ul style="list-style-type: none"> Communities are encouraged to send the draft plan to their ISO/CRS Specialist for a technical review and preliminary scoring (in addition to the State emergency management agency and FEMA for a courtesy review).

Table 1 - Categories of Mitigation Actions

Types of Mitigation Planning Actions	CRS Categories of Flood Mitigation Activities
• Local plans and regulations	1. Preventive measures (e.g., codes)
• Structure and infrastructure projects	2. Property protection (e.g., elevation)
• Natural systems protection	3. Natural resource protection
• [Not included *]	4. Emergency services
• Structure and infrastructure projects	5. Structural flood control projects
• Education and awareness programs	6. Public information
- See page 6-3 in the Local Mitigation Planning Handbook	- See Table 6 for an expanded list in the Mitigation Planning and the Community Rating System Key Topics Bulletin
* FEMA mitigation planning guidance calls for actions that “reduce or eliminate long-term risk to people and property from hazards and their impacts.” As such, programs like flood warning and response, and other emergency operations are not included.	