

# Local Mitigation Plan Review Tool

## Cover Page

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

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

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

Plan Information	
Jurisdiction(s)	Town of Littleton MA
Title of Plan	Town of Littleton Hazard Mitigation Plan 2024 Update
New Plan or Update	Update
Single- or Multi-Jurisdiction	Single-jurisdiction
Date of Plan	7/15/2024
Local Point of Contact	
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Additional Point of Contact	
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Review Information	
State Review	
<b>State Reviewer(s) Name/Title</b>	Jeffrey Zukowski, Hazard Mitigation Planner
<b>State Review Date</b>	2/11/2025
<b>State Review Date</b>	5/20/2025
<b>State Review Date</b>	Click or tap to enter a date.
FEMA Review	
<b>FEMA Reviewer(s) and Title</b>	Edgar Sada, CERC. Makenzie Wenninghoff, FEMA R1. Alexis Meehan, FEMA R1. Brigitte Ndikum-Nyada, FEMA R1.
<b>Date Received in FEMA Region</b>	2/11/2025
<b>Date Received in FEMA Region</b>	5/20/2025
<b>Date Received in FEMA Region</b>	Click or tap to enter a date.
<b>Plan Not Approved</b>	4/22/2025
<b>Plan Approvable Pending Adoption</b>	6/5/2025
<b>Plan Approved</b>	Click or tap to enter a date.

## Plan Review Checklist

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

Plan updates must include information from the current planning process.

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

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

### Element A: Planning Process

Element A Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>A1. Does the plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction? (Requirement 44 CFR § 201.6(c)(1))</b>		
A1-a. Does the plan document how the plan was prepared, including the schedule or time frame and activities that made up the plan’s development, as well as who was involved?	Page 1, Section 3, pages 11 to 17	Met
A1-b. Does the plan list the jurisdiction(s) participating in the plan that seek approval, and describe how they participated in the planning process?	Section 3, pages 15 - 16, Appendix C	Met

Element A Requirements	Location in Plan (section and/or page number)	Met / Not Met
<p><b>A2. Does the plan document an opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development as well as businesses, academia, and other private and non-profit interests to be involved in the planning process? (Requirement 44 CFR § 201.6(b)(2))</b></p>		
<p>A2-a. Does the plan identify all stakeholders involved or given an opportunity to be involved in the planning process, and how each stakeholder was presented with this opportunity?</p>	<p>Section 3, page 15 to 16 and Appendix C <b>17</b></p>	<p>Met</p>
<p><b>A3. Does the plan document how the public was involved in the planning process during the drafting stage and prior to plan approval? (Requirement 44 CFR § 201.6(b)(1))</b></p>		
<p>A3-a. Does the plan document how the public was given the opportunity to be involved in the planning process and how their feedback was included in the plan?</p>	<p>Section 3, pages 15 – 16 and Appendix C</p>	<p>Met</p>
<p><b>A4. Does the plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement 44 CFR § 201.6(b)(3))</b></p>		
<p>A4-a. Does the plan document what existing plans, studies, reports and technical information were reviewed for the development of the plan, as well as how they were incorporated into the document?</p>	<p>Section 3, page 12 and Section 10</p>	<p>Met</p>
<p><b>ELEMENT A REQUIRED REVISIONS</b></p>		
<p>Required Revision:</p> <p><b>A2-a.</b> The plan must provide documentation of an opportunity for stakeholders to be involved in the current planning process.  <i>Information, including a copy of the email that was sent, was included in Appendix C and the means of how the information was disseminated is available <u>on page 17.</u></i></p>		

## Element B: Risk Assessment

Element B Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>B1. Does the plan include a description of the type, location, and extent of all natural hazards that can affect the jurisdiction? Does the plan also include information on previous occurrences of hazard events and on the probability of future hazard events? (Requirement 44 CFR § 201.6(c)(2)(i))</b>		
B1-a. Does the plan describe all natural hazards that can affect the jurisdiction(s) in the planning area, and does it provide the rationale if omitting any natural hazards that are commonly recognized to affect the jurisdiction(s) in the planning area?	Section 4, pages 27 to 72	Met
B1-b. Does the plan include information on the location of each identified hazard?	Section 4, pages 28 to 72 and Appendix A, Hazard Maps	Met
B1-c. Does the plan describe the extent for each identified hazard?	Section 4, pages 28 to 72	Met
B1-d. Does the plan include the history of previous hazard events for each identified hazard?	Section 4, pages 28 to 72	Met
B1-e. Does the plan include the probability of future events for each identified hazard, including the type, location and range of anticipated intensities?	Section 4, pages 28 to 72	Met
B1-f. For participating jurisdictions in a multi-jurisdictional plan, does the plan describe any hazards that are unique to and/or vary from those affecting the overall planning area?	N/A	Choose an item.
<b>B2. Does the plan include a summary of the jurisdiction’s vulnerability and the impacts on the community from the identified hazards? Does this summary also address NFIP-insured structures that have been repetitively damaged by floods? (Requirement 44 CFR § 201.6(c)(2)(ii))</b>		
B2-a. Does the plan provide an overall summary of each jurisdiction’s vulnerability to the identified hazards?	Section 4, pages 28 to 72, and pages 81 to 85	Met
B2-b. For each participating jurisdiction, does the plan describe the potential impacts of each of the identified hazards on each participating jurisdiction?	Section 4, pages 28 to 72, and pages 81 to 85	Met

Element B Requirements	Location in Plan (section and/or page number)	Met / Not Met
B2-c. Does the plan address NFIP-insured structures within each jurisdiction that have been repetitively damaged by floods?	Section 3, page 36	Met

**ELEMENT B REQUIRED REVISIONS**

Required Revision:

**B1-a.** The plan must provide the rationale if omitting any natural hazards that are commonly recognized to affect the participant(s) in the planning area. Rationale is missing for Coastal Erosion, Coastal Flooding, Tsunami, and Changes in Groundwater. **This can be found on page 30, under table 7.**

**B1-c.** The plan must provide the extent of the hazards that can affect the planning area. **See text added on page 52(landslides), page 53 (extreme heat), and page 55 (extreme cold).**

**B2-a.** The plan must describe the vulnerability of each participant to the identified hazards. Vulnerability of current/future assets is missing for thunderstorms, extreme cold, drought, and hail. **See text on pages 65 (hail), page 64 (thunderstorms), page 56 (extreme cold), and page 52 (drought)**

**Element C: Mitigation Strategy**

Element C Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>C1. Does the plan document each participant’s existing authorities, policies, programs and resources and its ability to expand on and improve these existing policies and programs? (Requirement 44 CFR § 201.6(c)(3))</b>		
C1-a. Does the plan describe how the existing capabilities of each participant are available to support the mitigation strategy? Does this include a discussion of the existing building codes and land use and development ordinances or regulations?	Section 6, pages 92 to 96	Met
C1-b. Does the plan describe each participant’s ability to expand and improve the identified capabilities to achieve mitigation?	Section 6, page 101	Met
<b>C2. Does the plan address each jurisdiction’s participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement 44 CFR § 201.6(c)(3)(ii))</b>		
C2-a. Does the plan contain a narrative description or a table/list of their participation activities?	Section 6, page 93	Met

Element C Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>C3. Does the plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement 44 CFR § 201.6(c)(3)(i))</b>		
C3-a. Does the plan include goals to reduce the risk from the hazards identified in the plan?	Section 5, page 91	Met
<b>C4. Does the plan identify and analyze a comprehensive range of specific mitigation actions and projects for each jurisdiction being considered to reduce the effects of hazards, with emphasis on new and existing buildings and infrastructure? (Requirement 44 CFR § 201.6(c)(3)(ii))</b>		
C4-a. Does the plan include an analysis of a comprehensive range of actions/projects that each jurisdiction considered to reduce the impacts of hazards identified in the risk assessment?	Section 8, pages 109 to 112	Met
C4-b. Does the plan include one or more action(s) per jurisdiction for each of the hazards as identified within the plan's risk assessment?	Section 8, pages 113-118	Met
<b>C5. Does the plan contain an action plan that describes how the actions identified will be prioritized (including a cost-benefit review), implemented, and administered by each jurisdiction? (Requirement 44 CFR § 201.6(c)(3)(iv)); (Requirement §201.6(c)(3)(iii))</b>		
C5-a. Does the plan describe the criteria used for prioritizing actions?	Section 8, pages 108 & 11	Met
C5-b. Does the plan provide the position, office, department or agency responsible for implementing/administrating the identified mitigation actions, as well as potential funding sources and expected time frame?	Section 8, pages 113-118	Met

**ELEMENT C REQUIRED REVISIONS**

**Required Revision:**

**C2-a.** The plan must describe participation in the NFIP for each participant, as applicable, in accordance with NFIP regulatory requirements. The following information must be provided for each participant.

- Adoption of NFIP minimum floodplain management criteria via local regulation.
- Implementation and enforcement of local floodplain management regulations to regulate and permit development in SFHAs.

Identify the local zoning/bylaws that meet the minimum NFIP compliance requirements or regulate development in the floodplain. Summarize how local zoning/bylaws are used to regulate land use in the floodplain or Special Flood Hazard Area (SFHA). **This can be found on page 95**

**C4-b.** The mitigation actions do not address all the hazards named in the risk assessment. There are no actions that address the vulnerabilities identified in the risk assessment from dam hazards, hail, ice storms, or landslides. Each plan participant must identify one or more mitigation action the participant intends to implement for each hazard addressed in the risk assessment. **These hazards are now included in tables 45 and 46.**

**C5-a.** The criteria used for prioritizing the implementation of the actions must include an emphasis on the extent to which benefits are maximized, in relation to the associated costs of the action. The evaluation of Mitigation Priority on page 108 only describes how costs and benefits are factors into ‘High’ priority actions, “...the costs seem reasonable considering likely benefits from the measure.” Clarify how the Estimated Benefits and Estimated Costs assigned potential mitigation actions was used in the prioritization method to determine Mitigation Priority. **See revised text in Table 45**

**Element D: Plan Maintenance**

Element D Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>D1. Is there discussion of how each community will continue public participation in the plan maintenance process? (Requirement 44 CFR § 201.6(c)(4)(iii))</b>		
D1-a. Does the plan describe how communities will continue to seek future public participation after the plan has been approved?	Section 3, page18 and Section 9 page 119	Met
<b>D2. Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a five-year cycle)? (Requirement 44 CFR § 201.6(c)(4)(i))</b>		
D2-a. Does the plan describe the process that will be followed to track the progress/status of the mitigation actions identified within the Mitigation Strategy, along with when this process will occur and who will be responsible for the process?	Section 9, pages 119-120	Met
D2-b. Does the plan describe the process that will be followed to evaluate the plan for effectiveness? This process must identify the criteria that will be used to evaluate the information in the plan, along with when this process will occur and who will be responsible.	Section 9, page 119-120	Met



Element D Requirements	Location in Plan (section and/or page number)	Met / Not Met
D2-c. Does the plan describe the process that will be followed to update the plan, along with when this process will occur and who will be responsible for the process?	Section 3, page 17 and Section 9, pages 119 and 120	Met
<b>D3. Does the plan describe a process by which each community will integrate the requirements of the mitigation plan into other planning mechanisms, such as comprehensive or capital improvement plans, when appropriate? (Requirement 44 CFR § 201.6(c)(4)(ii))</b>		
D3-a. Does the plan describe the process the community will follow to integrate the ideas, information and strategy of the mitigation plan into other planning mechanisms?	Section 9, page 120	Met
D3-b. Does the plan identify the planning mechanisms for each plan participant into which the ideas, information and strategy from the mitigation plan may be integrated?	Section 9, page 120	Met
D3-c. For multi-jurisdictional plans, does the plan describe each participant's individual process for integrating information from the mitigation strategy into their identified planning mechanisms?	N/A, Single jurisdictional plan	Choose an item.
<b>ELEMENT D REQUIRED REVISIONS</b>		
Required Revision: Click or tap here to enter text.		

## Element E: Plan Update

Element E Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>E1. Was the plan revised to reflect changes in development? (Requirement 44 CFR § 201.6(d)(3))</b>		
E1-a. Does the plan describe the changes in development that have occurred in hazard-prone areas that have increased or decreased each community's vulnerability since the previous plan was approved?	Section 4, pages 81-82	Met

Element E Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>E2. Was the plan revised to reflect changes in priorities and progress in local mitigation efforts? (Requirement 44 CFR § 201.6(d)(3))</b>		
E2-a. Does the plan describe how it was revised due to changes in community priorities?	Section 1, page 3; Section 5, page 91; Section 7, pages 107	Met
E2-b. Does the plan include a status update for all mitigation actions identified in the previous mitigation plan?	Section 7, pages 102-95	Met
E2-c. Does the plan describe how jurisdictions integrated the mitigation plan, when appropriate, into other planning mechanisms?	Page 14, Section 7, pages 102-105	Met
<b>ELEMENT E REQUIRED REVISIONS</b>		
Required Revision: Click or tap here to enter text.		

## Element F: Plan Adoption

Element F Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>F1. For single-jurisdictional plans, has the governing body of the jurisdiction formally adopted the plan to be eligible for certain FEMA assistance? (Requirement 44 CFR § 201.6(c)(5))</b>		
F1-a. Does the participant include documentation of adoption?	Appendix D; to be added after FEMA approval of the plan (recommend submitting an unsigned copy with the revised plan)	Choose an item.
<b>F2. For multi-jurisdictional plans, has the governing body of each jurisdiction officially adopted the plan to be eligible for certain FEMA assistance? (Requirement 44 CFR § 201.6(c)(5))</b>		
F2-a. Did each participant adopt the plan and provide documentation of that adoption?	N/A	Choose an item.

<b>ELEMENT F REQUIRED REVISIONS</b>		
Required Revision:		
F1-a. Added to Appendix D, p. 153		

## Element G: High Hazard Potential Dams (Optional)

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

HHPD Requirements	Location in Plan (section and/or page number)	Met / Not Met
HHPD4-c. Does the plan identify the position, office, department or agency responsible for implementing and administering the action to mitigate hazards to or from HHPDs?	Click or tap here to enter text.	Choose an item.
<b>HHPD Required Revisions</b>		
Required Revision: Click or tap here to enter text.		

### Element H: Additional State Requirements (Optional)

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

## Plan Assessment

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

### Element A. Planning Process

#### Strengths

- The planning process narrative is detailed. There are details on the events and meetings that were part of the plan's development.
- The plan includes in-depth records of the planning process. The meeting agendas and social media posts support the narratives in this section. This will also help guide future updates.
- The planning team used a range of studies, reports and plans. The plan draws from local, state, federal and other resources. It is in-depth.

#### Opportunities for Improvement

- Invite stakeholders who are not in one of the five required groups. This will expand the types of concerns to address. It will grow the partnerships that can further mitigation in the planning area. It will also strengthen the plan and how it gets carried out.
- Factor in elements from other local plans. General plans, waterfront plans, and others may have data, goals and activities to include in the hazard mitigation plan. This will help align efforts within the planning area.

### Element B. Risk Assessment

#### Strengths

- The plan notes that the history of hazard events may not predict future risks well. The plan assesses each hazard's risks and vulnerabilities with this in mind.
- The plan includes a community profile. The plan has demographic information, development trends, and landscape features. This makes community assets and vulnerabilities clear.
- Maps clearly show the areas and sites that are most at risk.

#### Opportunities for Improvement

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

### Element C. Mitigation Strategy

#### Strengths

- The plan's goals and mitigation actions are integrated with other local planning efforts. This will help carry out the mitigation strategy better.

- The mitigation strategy includes strong actions that will directly reduce the vulnerabilities for each hazard in the plan. It is a best practice to create unique actions for each hazard in the risk assessment.

#### **Opportunities for Improvement**

- Multi-hazard and all-hazard actions are acceptable when they directly link to the vulnerabilities named in the risk assessment. Still, the community is strongly advised to develop unique actions for each hazard in the plan
- Pinpoint new capabilities to add to the planning team’s toolkit, aside from expanding on the current resources.
- Align the plan’s mitigation actions with the established actions of the community’s other planning efforts. Many transportation or land use planning efforts tie directly to mitigation. Their inclusion in the plan will inspire a more wide-ranging approach to address risk.
- Name alternative funding sources for projects. Think about resources you may use through FEMA, other federal agencies, state programs, regional planning agencies, nonprofits, etc. Look into how grant programs for related issues, such as water quality, can help reduce risks.

### **Element D. Plan Maintenance**

#### **Strengths**

- The steps to update the plan are described clearly. This will make the plan update process easy.
- The plan includes a number of plans and strategies that will factor in hazard mitigation.

#### **Opportunities for Improvement**

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

### **Element E. Plan Update**

#### **Strengths**

- Priorities are based on the current conditions and vision of the community. This way, the plan is truly the community’s plan.
- Progress on mitigation actions is clear and in-depth.

#### **Opportunities for Improvement**

- Explain more clearly how recent, current and planned development has or has not affected the community’s risk and vulnerability.
- Add lessons learned about carrying out mitigation actions. This would strengthen the plan. A short narrative on some “success stories” would also help.
- Discuss how mitigation activities have increased the community’s resilience and how they support other long-term planning goals.

## **Element G. HHPD Requirements (Optional)**

### **Strengths**

- [insert comments]

### **Opportunities for Improvement**

- [insert comments]

## **Element H. Additional State Requirements (Optional)**

### **Strengths**

- [insert comments]

### **Opportunities for Improvement**

- [insert comments]