

2.1.2 Federal Eligibility

Federal planning requirements stipulate that hazard mitigation plans must present a schedule for monitoring, evaluating, and updating the plan. A jurisdiction covered by a plan that has expired is not able to pursue elements of federal funding for which a current hazard mitigation plan is a prerequisite. The schedule for updating the plan in the 2004 effort was not followed, and that plan expired in 2009. 11 years passed since the initial planning effort, and coverage has lapsed from 2009 until the updated plan was approved in 2017. During the 2017 plan update, CRESA committed to maintaining this plan in accordance with federal requirements on behalf of the Clark regional hazard mitigation planning partnership that has committed to this process. The current update is being completed in compliance of federal expectations.

2.2 THE UPDATED PLAN—WHAT IS DIFFERENT?

The 2023 plan update was a challenge due to the kickoff being pushed back due to the COVID-19 Pandemic. The pandemic also limited the planning partner's available time and staffing to work on the mitigation plan update. To respect our partner's ability to complete the plan, we kept the plan update fairly simple and did not make changes to the structure of the plan. The mitigation plan update focused on updating the hazard analysis with updated/new information and data, as well as updating the jurisdictional annexes. We also added 2 new partners into the planning process, but lost one along the way.

Table 2-1 indicates the major changes between the two plans as they relate to 44 CFR planning requirements.

Table 2-1. Plan Changes Crosswalk

44 CFR Requirement	Previous Plan	Updated Plan
<p>§201.6(b): In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process shall include:</p> <ol style="list-style-type: none"> (1) An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval; (2) 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; and (3) Review and incorporation, if appropriate, of existing plans, studies, reports, and technical information. 	<p>The plan update was facilitated through a Steering Committee made up of stakeholders within the planning area. The Steering Committee was responsible for review of relevant plans and programs, review and identification of goals and objectives, confirmation of a public involvement strategy, development of a plan implementation and maintenance strategy, and review and approval of the draft plan. All Steering Committee meetings were open to the public. Additional public input was received through several public events early and late in the planning process and through a public survey. A 30-day public comment period was held before the draft plan was submitted for review. Agency coordination occurred through several avenues including the development of the risk assessment, monthly updates on plan progress distributed to a mailing list, attendance at steering committee meetings, the composition of the Steering Committee and the dissemination of the draft plan for public comment.</p>	<p>The plan update was facilitated through a Planning Team made up of representatives within the planning area. The Planning Team was responsible for review of relevant plans and programs, review and identification of goals and objectives, confirmation of a public involvement strategy, development of a plan implementation and maintenance strategy, and review and approval of the draft plan. Public input was received through release of a public feedback draft and social media updates. Due to limited outreach events stemming from the COVID-19 Pandemic, most outreach was conducted virtually. A 30-day public comment period was held before the draft plan was submitted for review. Agency coordination occurred through several avenues including the development of the risk assessment through a collaborative virtual platform, attendance at planning team meetings, and the dissemination of the draft plan for public comment.</p>
<p>§201.6(c)(2): The plan shall include a risk assessment that provides the factual basis for activities proposed in the strategy to reduce losses from identified hazards. Local risk assessments must provide sufficient information to enable the jurisdiction to identify and prioritize appropriate mitigation actions to reduce losses from identified hazards.</p>	<p>A comprehensive risk assessment for the planning area that looks at 8 natural hazards of concern: dam failure, drought, earthquake, flood, landslide, severe weather, volcanic hazards, and wildfire. This assessment used the best available data and science with the Hazus-MH (version 2.2) risk assessment software and GIS analysis.</p>	<p>Time and funding limitations prevented a full Hazus-MH risk assessment from being completed, but information was updated where relevant new data was available. All relevant data tables and figures were updated to include the most up-to-date information. Additionally, information from the Portland-Vancouver Metro Area’s Enhanced Earthquake Analysis was included in the analysis.</p>
<p>§201.6(c)(2)(i): [The risk assessment shall include a] description of the ... location and extent of all natural hazards that can affect the jurisdiction. The plan shall include information on previous occurrences of hazard events and on the probability of future hazard events.</p>	<p>Comprehensive risk assessments of each hazard of concern are presented in Chapters 7 through 14. Each chapter includes the following:</p> <ul style="list-style-type: none"> • Hazard profile, including maps of extent and location, historical occurrences, frequency, severity and warning time • Secondary hazards • Exposure of people, property, critical facilities and environment • Vulnerability of people, property, critical facilities and natural environment • Future trends • Scenarios • Issues. <p>Each hazard is compared to each other via a risk ranking methodology described in Chapter 15.</p>	<p>Comprehensive risk assessments of each hazard of concern are presented in Chapters 7 through 14. Each chapter includes the following:</p> <ul style="list-style-type: none"> • Hazard profile, including maps of extent and location, historical occurrences, frequency, severity and warning time • Secondary hazards • Exposure of people, property, critical facilities and environment • Vulnerability of people, property, critical facilities and natural environment • Future trends • Scenarios • Issues. <p>Each hazard is compared to each other via a risk ranking methodology described in Chapter 15.</p>

44 CFR Requirement	Previous Plan	Updated Plan
<p>§201.6(c)(2)(ii): [The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i). This description shall include an overall summary of each hazard and its impact on the community</p>	<p>Vulnerability was assessed for all hazards of concern. The Hazus-MH computer model was used for the dam failure, earthquake, and flood hazards. These were Level-2 (user-defined) analyses using coordinating agency and County data. Critical facilities and assets were defined and inventoried using the Hazus Comprehensive Data Management System and other available datasets. Outputs were generated for other hazards by applying an estimated damage function to affected assets when available. The asset inventory was extracted from the Hazus-MH model. Best available data were used for all analyses.</p>	<p>The current plan utilizes the information from the 2016 hazard analysis and provide updated data/information as supplement to the previous needs.</p>
<p>§201.6(c)(2)(ii): [The risk assessment] must also address National Flood Insurance Program insured structures that have been repetitively damaged floods</p>	<p>The description of the National Flood Insurance Program and repetitive loss discussion was enhanced to meet new DMA and CRS planning requirements. The update includes an analysis of repetitive loss properties. For these properties the type of structure was determined and likely causes of flooding were cited, and the information was reflected on maps. National Flood Insurance Program capability is also assessed for each jurisdiction in Volume II.</p>	<p>The repetitive loss properties were updated to include losses between the previous plan and the current.</p>
<p>§201.6(c)(2)(ii)(A): The plan should describe vulnerability in terms of the types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard area.</p>	<p>A complete inventory of the numbers and types of buildings exposed was generated for each hazard of concern. The Steering Committee defined "critical facilities" as they pertained to the planning area, and these facilities were inventoried. Each hazard chapter provides a discussion of future development trends as they pertain to the hazard.</p>	<p>Future development numbers were updated to the best of the ability. Limited changes have been made to the comprehensive growth plan since the last update. The current growth plan is current through 2035. Estimates were updated where data allowed.</p>
<p>§201.6(c)(2)(ii)(B): [The plan should describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(i)(A) and a description of the methodology used to prepare the estimate.</p>	<p>Dollar loss estimations were generated for all hazards of concern likely to impact property. These were generated by Hazus for the dam failure, earthquake, and flood. For the other hazards, loss estimates were generated by applying a regionally relevant damage function to the exposed inventory. In all cases, a damage function was applied to an asset inventory. The asset inventory was the same for all hazards and was generated in the Hazus-MH model.</p>	<p>Funding and time constraints prevented running a full comprehensive vulnerability assessment. While there has been development and inflation since the 2016 plan was completed, the estimates from the 2016 Hazus-MH analysis were used for this update, with the understanding that a full analysis will need to be run for the next mitigation plan update.</p>

44 CFR Requirement	Previous Plan	Updated Plan
§201.6(c)(2)(ii)(C): [The plan should describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.	There is a discussion on future development trends as they pertain to each hazard of concern. This discussion looks predominantly at the existing land use and the current regulatory environment that dictates this land use and also includes information on vacant buildable lands where feasible.	There is a discussion on future development trends as they pertain to each hazard of concern. This discussion looks predominantly at the existing land use and the current regulatory environment that dictates this land use and also includes information on vacant buildable lands where feasible.
§201.6(c)(2)(iii): For multi-jurisdictional plans, the risk assessment must assess each jurisdiction's risks where they vary from the risks facing the entire planning area.	Risk assessment results were generated for each planning partner to support the concept of risk ranking, which was performed by each planning partner. Risk ranking was used by each planning partner to provide vision and focus to action plan development.	Risk assessment results were generated for each planning partner to support the concept of risk ranking, which was performed by each planning partner. Risk ranking was used by each planning partner to provide vision and focus to action plan development.
§201.6(c)(3): The plan shall include a mitigation strategy that provides the jurisdiction's blueprint for reducing the potential losses identified in the risk assessment, based on existing authorities, policies, programs and resources, and its ability to expand on and improve these existing tools.	Action plans were developed for each planning partner via a facilitated process that includes: <ul style="list-style-type: none"> • Risk ranking • Capability assessment • Action alternative review • Action selection • Action prioritization • Action category analysis 	Action plans were developed for each planning partner via a facilitated process that includes: <ul style="list-style-type: none"> • Risk ranking • Capability assessment • Action alternative review • Action selection • Action prioritization • Action category analysis
§201.6(c)(3)(i): [The hazard mitigation strategy shall include a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.	The plan update identifies a purpose, 6 goals and 12 objectives. Goals were selected that support the purpose, objectives were selected that meet multiple goals, and actions were selected and prioritized based on meeting multiple objectives.	The plan update identifies a purpose, 6 goals and 12 objectives. Goals were selected that support the purpose, objectives were selected that meet multiple goals, and actions were selected and prioritized based on meeting multiple objectives.
§201.6(c)(3)(ii): [The mitigation strategy shall include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.	A hazard mitigation best practices catalog was developed through a facilitated process that looks at strengths, weaknesses, obstacles and opportunities in the planning area. This catalog identifies actions that manipulate the hazard, reduce exposure to the hazard, reduce vulnerability, and increase mitigation capability. The catalog further segregates actions by scale of implementation. A table in the action plan section analyzes each action by mitigation type to illustrate the range of actions selected.	A hazard mitigation best practices catalog was developed through a facilitated process that looks at strengths, weaknesses, obstacles and opportunities in the planning area. This catalog identifies actions that manipulate the hazard, reduce exposure to the hazard, reduce vulnerability, and increase mitigation capability. The catalog further segregates actions by scale of implementation. A table in the action plan section analyzes each action by mitigation type to illustrate the range of actions selected.
§201.6(c)(3)(ii): [The mitigation strategy] must also address the jurisdiction's participation in the National Flood Insurance Program, and continued compliance with the program's requirements, as appropriate.	All municipal planning partners were asked to assess National Flood Insurance Program capability in their jurisdictional annexes. All participating communities have identified actions supporting continued compliance and good standing under the program.	All municipal planning partners were asked to assess National Flood Insurance Program capability in their jurisdictional annexes. All participating communities have identified actions supporting continued compliance and good standing under the program.

44 CFR Requirement	Previous Plan	Updated Plan
§201.6(c)(3)(iii): [The mitigation strategy shall describe] how the actions identified in Section (c)(3)(ii) will be prioritized, implemented, and administered by the local jurisdiction. Prioritization shall include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.	Each of the recommended actions is prioritized using a qualitative methodology that looked at the objectives the project will meet, the timeline for completion, how the project will be funded, the impact of the project, the benefits of the project and the costs of the project. This prioritization scheme is detailed in Chapter 18.	Each of the recommended actions is prioritized using a qualitative methodology that looked at the objectives the project will meet, the timeline for completion, how the project will be funded, the impact of the project, the benefits of the project and the costs of the project. This prioritization scheme is detailed in Chapter 18.
§201.6(c)(4)(i): [The plan maintenance process shall include a] section describing the method and schedule of monitoring, evaluating, and updating the mitigation plan within a five-year cycle.	A detailed plan maintenance strategy is provided that includes the following: <ul style="list-style-type: none"> • Annual review and progress reporting • Defined role for Steering Committee • Plan update triggers • Plan incorporation guidelines • Strategy for continuing public involvement • Grant coordination protocol 	A detailed plan maintenance strategy is provided that includes the following: <ul style="list-style-type: none"> • Annual review and progress reporting • Defined role for Steering Committee • Plan update triggers • Plan incorporation guidelines • Strategy for continuing public involvement • Grant coordination protocol
§201.6(c)(4)(ii): [The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate.	This is included in the detailed plan maintenance strategy and also discussed in each jurisdictional annex.	This is included in the detailed plan maintenance strategy and also discussed in each jurisdictional annex.
§201.6(c)(4)(iii): [The plan maintenance process shall include a] discussion on how the community will continue public participation in the plan maintenance process.	This is included in the detailed plan maintenance strategy.	This is included in the detailed plan maintenance strategy.
§201.6(c)(5): [The local hazard mitigation plan shall include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commission, Tribal Council).	17 planning partners will seek DMA compliance for this plan. Appendix G contains the resolutions of all planning partners that adopted this plan	