

APPENDIX F

APPENDIX F: LMS CROSSWALK

2025 LMS PLAN CROSSWALK

Appendix F includes the completed LMS Plan crosswalk for the draft Hardee County 2025 Multi-Jurisdictional Local Mitigation Strategy (LMS).

- LMS Plan crosswalk

2023 Florida Local Mitigation Strategy (LMS) Crosswalk

DESCRIPTION:

The Florida Local Mitigation Strategy (LMS) Crosswalk is informed by the FEMA Local Mitigation Planning Policy Guide (effective April 19, 2023). Each requirement listed below is a required element of the FEMA Policy Guide. There is a difference in formatting when comparing the FL Crosswalk with FEMA's Policy Guide Elements. This is to prevent the possibility of skipping various components of each FEMA requirement. You will notice the specific FEMA requirement is listed in parentheses next to each FL Crosswalk Element (e.g., P1 in the FL Crosswalk is equivalent to FEMA Element A-1). As such, multiple FL Crosswalk Elements may correspond to the same FEMA Element.

INSTRUCTIONS:

Enter the requested information in each field below:

1. In the "Crosswalk Tab," please identify the "Urgency of Plan" using the corresponding page numbers for each requirement.

2. In the Jurisdiction Checklist Tab, please add each of the "participating" jurisdictions.

*Please do not edit the following sections: Met, Not Met, Reviewer Comments. If revisions are required, the State reviewer will put revisions in the Required Revisions section. As revisions are made, please feel free to add comments about the revisions in the same section. Do not remove my State comments. Additionally, a Project List Template can be found in a separate tab below.

Jurisdiction:	Hardee County	Title of Plan:	Hardee County 2025 Multi-Jurisdictional Local Mitigation Strategy Plan
Local Point of Contact:	Lane Schneider, FABM	Address:	404 W. Orange Street Wauchula, FL 33873
Title:	Director of Emergency Management	Email:	laneschneider@hardeecountyfl.gov
Agency:	Hardee County Emergency Management	Phone Number:	863-773-6373
State Reviewers:	Mitchell Budhuis, Evan Jenkins, Sabrina Uribe, Angie Odell		
Date Received by FDEM:	10/22/2024, 1/6/2025, 2/19/2025		
Date Plan Not Approved:	10/28/2024, 1/15/2025, 3/10/2025		
Date Plan APA:			
Date Plan Approved:			

Planning Process (FEMA Element A)	Location in Plan	Met	Not Met	Reviewer Comments	Required Revisions	Reviewer Notes
P1 (A1-a)	The plan must document the current planning process.	X		The plan accurately documents the current planning process, including the LMSWG and participation requirements for all stakeholders.		P2/P3: Ensure the list of participating jurisdictions is consistent throughout the Plan and listed fully on the Jurisdiction Checklist tab. Consider adding special districts, state agencies, WMDs, universities, and other eligible entities. Any group that will have a project on the project list and apply for HMA grants. Note that if jurisdictions do not participate in the planning process but want to apply for grants later on, there are additional steps they will need to complete - it is best for them to be included from the beginning.
P2 (A1-b)	The plan must list the jurisdiction(s) in the current plan that will seek approval.	X		The jurisdictions seeking approval are explicitly listed through out the plan in several places.		P4: The specific entities may be defined by each jurisdiction based on the unique characteristics of the local government, including special districts. The purpose of inviting input is to integrate natural hazard risk reduction across all community systems, as well as encourage implementation of mitigation actions. Discuss how organizations that provide support to underserved communities and vulnerable populations were given the opportunity to be involved.
P3 (A1-b)	The plan must list the representative from each jurisdiction that will seek approval and how they participated in the planning process. (At a minimum, it must identify the jurisdiction representative and the person's agency and title within the jurisdiction.)	X		Appendix A and Appendix C		Community Lifelines: Safety and Security; Food, Hydration, Shelter; Health and Medical; Energy, Communications; Transportation; Hazardous Materials; Water Systems
P4 (A2)	The plan must provide documentation of an opportunity for stakeholders to be involved in the current planning process. Documentation of this opportunity must identify how each of the stakeholders (see below) were presented with this opportunity, as applicable.	X		Section II, pg. 6-8; Appendix E		P5: Include information about how underserved communities and vulnerable populations were provided an opportunity to be involved in the planning process.
P5 (A3)	The plan must document how the public had an opportunity to be involved in the current planning process and what that participation entailed, including how underserved communities and vulnerable populations within the planning area were provided an opportunity to be involved.	X		Section II, pg. 6-8; Appendix E		P6: Element may be met with a narrative of resources utilized (including bullet list) and citations used throughout or a bibliography. See examples in FEMA Guidance Notes section. Gaps and limitations may be addressed as actions in the mitigation strategy in particular for items that require additional assistance.
P6 (A4)	The plan must document what existing plans, studies, reports and technical information were reviewed and how they were incorporated, if appropriate, into the development/update of the plan.	X		Section VI, p. 4-7		P7: Regulatory/flood maps are required to be in the Plan. This may be best located in the Risk Assessment section, however, it must be somewhere in the Plan.

FEMA Element A				
P7 (A)	For jurisdictions with structures for which National Flood Insurance Program (NFIP) coverage is available, regulatory flood mapping products are required to be incorporated, if applicable. Participants may use other jurisdiction-specific materials, including non-regulatory flood mapping products, that improve upon NFIP regulatory flood mapping products.	x		Should describe how flood maps in appropriate locations.
FEMA Guidance Notes: Documentation to provide factual evidence for how the participants developed/updated the plan. Documentation may include narrative descriptions, copies of meeting minutes, sign-in sheets, or newspaper articles. Examples of documentation to provide involvement/feedback may include, but are not limited to, narratives, materials from open meetings, screenshots of social media postings, and/or interactive websites with drafts for public review and comment, questionnaires or surveys through utility bills, etc. Involvement means being engaged and actively participating in the development of the plan; providing input and directly providing, affecting or editing plan content as the representative of the participating jurisdiction(s) or organization. Stakeholders include local and regional agencies involved in hazard mitigation activities; agencies that have the authority to regulate development; neighboring communities; representatives of business, academia, and other private organizations; representatives of non-profit organizations. Attribution: The opportunity must occur during the plan's development, meaning prior to the plan's submission for formal review. In addition, the plan must document how public feedback was included throughout the planning process. Examples for P7: state hazard mitigation plan; local plans (such as comprehensive/master/general land use, economic development, capital improvement, affordable housing, resource management, resilience, climate, etc.); and hazard-specific reports and plans (such as Community Wildfire Protection Plans).				
Risk Assessment (FEMA Element B)				
	Location in Plan	Met	Not Met	Reviewer Comments
R1 (B1-a)	The plan must include a description of all natural hazards that can affect the jurisdiction(s) in the planning area and their assets, such as dams, located outside of the planning area.	Section III, p. 2-65 x		Identified hazard(s) not described.
R2 (B1-a)	The plan must provide rationale for the omission of any natural hazards that are commonly recognized to affect the jurisdiction(s) in the planning area.	Section III, p. 3-6 x		Identified location(s), no damage included.
R3 (B1-b)	The plan must include information on location for each identified hazard.	Section III, p. 6-65 and Appendix B x		Identified location(s), location(s) across jurisdiction(s).
R4 (B1-c)	The plan must provide the extent of the hazards that can affect the planning area.	Section IV, p. 11-26 x		Identified and analyzed one-time event(s) & hazard-based effects planning area. Extreme Gold Growth SMART+ System of Risk Analysis, Wildfires, Dam/Lake Failure
R5 (B1-d)	The plan must include information on previous occurrences for each hazard that affects the planning area at a minimum, this includes any state and federal major disaster declarations for the planning area since the last update.	Section III, p. 6-65 x		Identified hazard(s) not described. General discussion of climate change.
R6 (B1-e)	The plan must include the probability of future events for the identified hazards that can affect the planning area.	Section III, p. 6-65 x		No probability analysis included. Identified hazard(s) not described. General discussion of climate change.
R7 (B1-f)	For multi-jurisdictional plans, when hazard risks differ across the planning area and between participating jurisdictions, the plan must specify the unique and varied risk information for each applicable jurisdiction and their assets outside the planning area.	Section III, p. 6-65 x		Identified hazard(s) not described. Identified hazard(s) not described. Identified hazard(s) not described.
R8 (B2-b)	The plan must describe the potential impacts on each participating jurisdiction and its identified assets.	Section III, p. 7-65 x		Identified hazard(s) not described. Identified hazard(s) not described.
R9 (B2-a)	The plan must describe the overall vulnerability of each participant to the identified hazards.	Section IV, p. 9-44 and Appendix B x		Identified hazard(s) not described. Identified hazard(s) not described.
R10 (B2-a)	For plan updates, the risk assessment must meet Element E1-a (Changes in Development).	Section III, p. 12-48 x		Identified hazard(s) not described. Identified hazard(s) not described. Identified hazard(s) not described.
R11 (B2-c)	The plan must address repetitively flooded NFIP-insured structures by including their estimated numbers and types (residential, commercial, institutional, etc. of repetitive/severe repetitive loss properties for each jurisdiction).	PDF 65-71, 132-133 170, 175-178	x	Need to include data for RL and SLR properties including estimated numbers and types of structures for each jurisdiction.

FEMA Guidance Notes:

Description means to provide a narrative description or definition.

Location is defined as the unique geographic boundaries within the planning area, or assets that may be affected by the identified hazard if maps are used, provide sufficient detail and scale to clearly identify the hazard locations within and/or affecting assets owned by the participating jurisdiction(s), if narrative descriptions are used must contain enough detail to clearly identify the red(s) that will be affected by the hazard.

Extent is defined as the range of anticipated intensities of the identified hazards. Extent is most commonly expressed using various scientific scales. When using scales, the plan must document how the scale applies to each jurisdiction.

Precious Occurrences should include an emphasis on significant events, as determined by the community.

Probability can be defined as historical frequencies, statistical probabilities, hazard probability maps and/or general descriptors. It must include the effects of future conditions, including climate change (e.g., long-term weather patterns, average temperature and sea levels), on the type, location, and range of anticipated intensities of the identified hazards.

Impacts are the consequences or effects of each hazard on the identified assets. The narrative must include the effects of climate change changes in population patterns, and changes in land use and development. Gaps and limitations may be addressed as actions in the mitigation strategy, in particular for items that require additional assistance.

Vulnerability is the description of which assets, including structures, systems, populations and other assets, are at risk from the identified hazards. The description must include current and future assets (including people) and the risk that makes them susceptible to damage from the identified hazards.

Assets are, but not limited to, people (underserved communities and socially vulnerable populations); structures (facilities, lifelines, critical infrastructure); systems (networks and capabilities); natural, historic, and cultural resources; activities that have value to the community.

Changes in development means recent development, potential development, or conditions that may affect the risks and vulnerabilities of the jurisdictions or shifts in the needs of underserved communities or gaps in social equity. This can also include changes in local policies, standards, codes, regulations, land use regulations and other conditions.

Mitigation Strategy (FEMA Element C)	Location in Plan	Met	Not Met	Reviewer Comments	Required Revisions
S1 (C1-a)	The plan must describe how the existing authorities, policies, programs, funding, and resources of each participant are available to support the mitigation strategy. This must include a discussion of the existing building codes and land use and development ordinances or regulations. Capabilities may be described in a table or narrative.	Appendix C, PDF 88 99	X		No description of how each participant supports the mitigation strategy. Gaps and lack of capability should be discussed as applicable.
S2 (C1-b)	The plan must describe the ability of each participant to expand on and improve the capabilities described in the plan (see S1).	Appendix C, PDF 88 99	X		Describe a ability of each participating jurisdiction to expand and improve capability throughout the planning cycle.
S3 (C2-a)	The plan must describe participation in the NPP for each participant , as applicable, in accordance with NPP regulatory requirements (see reviewer notes).	Section I, p. 22-25		X	Not included in the NPP. Description of how participants implement the substantial improvement/substantial damage provisions in their floodplain management regulations after an event.
S4 (C3-a)	The plan must include goals to reduce the risk of the identified hazards.	PDF 49-51	X		Missing the S/S process. See Reviewer Notes for S3
S5 (C4-a)	The mitigation strategy must include an analysis of a comprehensive range of actions or projects that the participants considered to specifically address vulnerabilities identified in the risk assessment.	PDF 56-65	X		The plan does a good job identifying goals for the county and objectives for each goal. Plan identifies and addresses mitigation activities to address vulnerabilities identified in the risk assessment t
S6 (C4-b)	Each Plan participant must identify one or more mitigation actions (the participants) intends to implement for each hazard addressed in the risk assessment.	PDF pf 236	X		Not included in the S/S process. See Reviewer Notes for S3
S7 (C5-a)	The plan must describe the criteria used for prioritizing the implementation of the actions. The criteria must include an emphasis on the extent to which benefits are maximized, in relation to the associated costs of the action.	Section V, pg 22 - 23		X	Description of prioritization criteria for actions. State Polk County as the process, please correct.
S8 (C5-b)	The action plan must identify who is responsible for administering each action, along with the action's potential funding sources and expected time frames for completion.	PDF pg 236	X		Note included in the S/S process. Description of prioritization criteria for actions. State Polk County as the process, please correct.

Reviewer Notes
S1. Capabilities must be discussed for each participating jurisdiction. Gaps and lack of capability should be discussed as applicable.
S2. Describe the ability of each participating jurisdiction to expand and improve capability throughout the next planning cycle (5 years).
S3. The following information must be provided for each participant. 1. Adoption of NFIP minimum floodplain management criteria via local regulation. 2. Adoption of the latest effective Flood Insurance Rate Map (FIRM), if applicable. 3. Implementation and enforcement of local floodplain management regulations to regulate and permit development in SFHAs. 4. Appointments of a designee or agency to implement the addressed commitments and requirements of the NPP. 5. Description of how participants implement the substantial improvement/substantial damage provisions in their floodplain management regulations after an event.
S5. The range of actions considered should include mitigation actions that benefit underserved communities and socially vulnerable populations. Actions must be clearly linked to the vulnerabilities and impacts identified in the risk assessment.
S6. Each participating jurisdiction should have a project on the project list. If this is not possible due to lack of capability, consider adding multi-jurisdictional projects, county-wide projects (such as planning/education), or something similar. If that is not feasible, include a narrative for the lack of capability within the Plan.
S8. Include the position/office/department/agency responsible for implementing the projects, potential funding sources, and a timeframe for completion. Generic terms should be avoided or defined (e.g., short-term, medium-term, and long-term).

FEMA Guidance Notes:	The plan may contain a narrative description or other materials that provide context on a section of the plan. Describing current capabilities provides a rationale for which mitigation projects can be undertaken to address the vulnerabilities identified in the Risk Assessment.
For C.1.b.: Participants do not have the ability or authority to expand and/or improve their capabilities, the plan must describe the lack of ability or authority.	
For C.2.a.: The following information must be provided for each participant: adoption of NFIP minimum floodplain management criteria via local regulation; adoption of the latest effective flood insurance Rate Map (if applicable); implementation and enforcement of local floodplain management criteria via local regulation; appointment of a designer or agency to regulate and permit development in SFAs; appointment of a designer or agency to implement the addressed commitments and requirements of the NFIP; and description of how participants implement the substantial improvements/substantial damage provisions of their floodplain management regulations after a event. Simply stating "The community will continue to comply with the NFIP" is not sufficient to meet the requirement.	
Goals are broad, long-term policy and vision statements that explain what is to be achieved by implementing the mitigation strategy. The goals must be consistent with the hazards identified in the plan. Goals may be presented as generic statements applying to more than one hazard, or they may be limited to each of the identified hazards.	
A mitigation action is a measure, project, plan, or activity proposed to reduce current and future vulnerabilities described in the risk assessment. These actions must be achievable and demonstrate how the mitigation activities reduce the risks identified in the risk assessment.	
Analyzing a comprehensive range means considering mitigation alternatives spanning all types of solutions. These may include local plan and regulations, structure and infrastructure projects, natural systems protection, and education and awareness programs.	
For C.4.a: Actions considered must emphasize reducing risk to existing buildings, structures and infrastructure, as well as limiting risk to new development and redevelopment. The range of actions considered should include mitigation actions that benefit underserved communities and socially vulnerable populations.	
For C.5.b: The plan must identify applicable potential funding sources, with details beyond generic terms such as "federal," "state" and/or "local." The plan must provide the position, office, department, or agency responsible for implementing/administrating the identified mitigation actions.	

Plan Maintenance (FEMA Element D)		Location in Plan	Met	Not Met	Reviewer Comments	Required Revisions
M1 (D1-a)	The plan must describe how the participant(s) will continue to seek public participation after the plan has been approved and during the plan's implementation, monitoring, and evaluation.	Section VI: Page VI-3	X		Strong emphasis on social media, advertising meetings in several publications and locations, and use of news media to announce meetings for the public to engage in the process.	
M2 (D2-a)	The plan must identify how, when, and by whom the plan will be tracked for implementation over its five-year cycle (monitoring).	Section VI: Page VI-1	X		LMS Chairperson is identified to monitor, maintain, and evaluate the LMS over the five-year cycle	
M3 (D2-b)	The plan must identify how, when, and by whom the plan will be assessed for effectiveness at achieving its stated purpose and goals (evaluating).	Section VI: Page VI-1	X		LMSWG is identified to evaluate the effectiveness of the LMS plan at achieving the purpose and goals	
M4 (D2-c)	The plan must identify how, when, and by whom the plan will be reviewed and revised at least once every five years (updating).	Section VI: Page VI-1	X		The LMSWG is identified to review and revise the LMS plan at least once every five years.	
M5 (D3-a)	The plan must describe the community's process to integrate the plan's data, information, and hazard mitigation goals and actions into other planning mechanisms.	Section VI: Pages VI-4 thru VI-6 and Appendix C	X		The plan describes how the community integrates the information into other community planning mechanisms.	
M6 (D3-e)	A multi-jurisdictional plan must describe each participant's individual process for integrating information from the mitigation strategy into their identified planning mechanisms.	PDF: T1-T2	X		Provided due dates for each participant to integrate.	
M7 (D3-b)	The plan must identify the local planning mechanisms where hazard mitigation information/actions may be integrated. The identified list of planning mechanisms may be applicable to the plan participants and not contradict the identified capabilities.	Section VI: Page VI-5 thru VI-7, V-10 thru V-19	X		The plan lists all community planning mechanisms that will integrate data, objectives, and goals from the LMS	

FEMA Guidance Notes:

For C.1.a: The plan may contain a narrative description or an itemized list of steps, demonstrating the prescribed method that will be followed to obtain future public participation.

Evaluating means tracking the implementation of the plan over time. For example, monitoring may include a system for tracking the status of the identified hazard mitigation actions.

Updating means reviewing and revising the plan at least once every five years.

Integrate means to include hazard mitigation principles, vulnerability information and mitigation actions into other existing community planning to leverage activities that have co-benefits reduce risk and increase resilience.

Planning mechanisms refer to the governance structures used to manage local land use development and community decision-making.

For a multi-jurisdictional integration plan, this element may be met with a general narrative description if the process is applicable to each of the plan participants, however, any participant who cannot apply the same process as other plan participants must include their unique process for integration.

Plan Update (FEMA Element E)

		Location in Plan	Met	Not Met	Reviewer Comments	Required Revisions
U1 (E1-a)	The plan must describe changes in development that have occurred in hazard-prone areas and how they have increased or decreased the vulnerability of each jurisdiction since the previous plan was approved.	Sections III and IV		X	171 - appreciate the building permit map as it shows how development may actually be changing and increasing	Not found in plan See R10, these requirements correspond with each other
U2 (E2-a)	The plan must describe how it was revised due to a change in priorities for each jurisdiction.	PDF: pg. 33	X			

Reviewer Notes

U1: This element is also linked to element R10 in the risk assessment section. Make sure to discuss change in vulnerability (positive, negative, or none) to hazards from changes in development that has occurred over the last five years (planning cycle).
U2: How was the plan revised and was it due to a change in priority? Examples include new leadership, recent hazard events, input from the public, etc. We are usually referring to similar and objectives, risk assessment, mitigation strategy, project prioritization method, or similar

U3 (EZ-b)		The plan must describe the status of all hazard mitigation actions in the previous plan by identifying whether they have been completed or not, for each jurisdiction.	Appendix D, PDF 201-202	X			Next planning cycle dates are included, along with information that will be updated and integrated throughout the next cycle	Next planning cycle dates are included, along with information that will be updated and integrated throughout the next cycle
U4 (EZ-c)		The updated plan must explain how the jurisdiction(s) integrated information from the mitigation plan into other planning mechanisms, as demonstration of progress in local hazard mitigation efforts. If information from the previous plan was not integrated into other planning mechanisms, this must be stated.	I4, Section VI PDF 155, 157-158	X				
FEMA Guidance Notes: Changes in development means recent development, potential development, or conditions that may affect the risks and vulnerabilities of the jurisdictions or shifts in the needs of undeserved communities or gaps in social equity. This can also include changes in local policies, standards, codes, regulations, and use of regulations and other conditions. No development changes affected the jurisdiction's over all vulnerability, this must be stated with the plan. Description of priorities: A description of priorities is defined by the participant(s). If the participant(s) has no change in priorities since the last approval of the mitigation plan, this must be stated. This can be a narrative or with detailed statements in appropriate sections of the plan. Actions: For actions that are not complete, the plan must state whether the action is no longer relevant or will be included in the updated action plan.								
Plan Adoption (FEMA Element F)		Location in Plan	Met	Not Met	Reviewer Comments	Reviewer Notes		
A1 (F1-a)	The jurisdiction must provide documentation of plan adoption, usually a resolution by the governing body or other authority, to receive approval.	Section VII, page VII 1 and Appendix H				Ideally, all jurisdictions will formally adopt the Approvable Pending Adoption (APA) plan before the current expiration date. This will depend on state review time and required revisions. Jurisdictions must adopt the LMS Plan within one year of APA status. Beyond one year, jurisdictions will need to validate the accuracy of their information within the Plan in order to receive FEMA approval.		
A2 (F2-a)	To receive approval, the participants must adopt the plan and provide documentation that the adoption has occurred.	Section VII, page VII 1 and Appendix H						
FEMA Guidance Notes: Jurisdiction Adoption: At least one adoption resolution should be transmitted through the State to FEMA for the LMS Plan to be officially approved. The remaining resolutions may be transmitted as they are completed. Participants may provide it in the form of meeting minutes, resolutions, signed letter or any other method to demonstrate that official adoption by the participant has occurred.								
High Hazard Potential Dams (FEMA Element G) *Eligibility Requirement for HHPP Grant Program		Location in Plan	Met	Not Met	Reviewer Comments	Reviewer Notes		
D1 (HHPD1-a)	The plan must describe how the local government worked with the local dam owner and/or the state dam safety agency (FDEP).					These elements are optional, but are an eligibility requirement of the Rehabilitation of High Hazard Potential Dam Grant Program. Consider including this information in your LMS Plan if you have high hazard or significant hazard dams in the planning area. If there are any BOPs or limitations, this should be discussed as applicable.		
D2 (HHPD1-b)	The plan incorporates information shared by the state and/or local dam owners.							
D3 (HHPD2-a)	The plan describes the risks and vulnerabilities to and from HHPDs (included in risk assessment).							
D4 (HHPD2-b)	The plan documents the initiatives and describes how to address deficiencies (in the risk assessment).							
D5 (HHPD3-a)	The plan addresses how to reduce vulnerabilities to and from HHPDs as part of its own goals or with other long-term strategies. The plan does not need to include a goal specific to HHPDs alone.							
D6 (HHPD3-b)	The plan links proposed actions to reduce long-term vulnerabilities that are consistent with its goals.							
D7 (HHPD4-a)	The plan must describe specific actions to address HHPDs (prioritize list).							
D8 (HHPD4-b)	The plan describes the criteria used to prioritize actions related to HHPDs.							
D9 (HHPD4-c)	The plan identifies the position, office, department or agency responsible for implementing and administering the action to mitigate hazards to or from HHPDs.							

FEMA Guidance Notes:

Note: ensure sensitive and/or personally identifiable information is protected.

Information shared by the state and/or local dam owners includes: inundation maps; EAP; Floodplain Plans; dam breach modeling software, as well as more detailed studies. Risk and vulnerabilities can include potential cascading impacts of storms, wildfires, etc. on dams that may affect upstream and downstream flooding; potential significant economic, environmental or social impacts, as well as multi-jurisdictional impacts, from a dam incident; location and size of populations at risk; and potential impacts to institutions and critical infrastructure/facilities/lifelines; and/or methodology and/or assumptions for risk data and inundation modeling. Specific actions include rehabilitating/removing dams; adopting and enforcing land use ordinances in inundation zones; elevating structures in inundation zones; and/or adding flood protection, such as berms, floodwalls or floodproofing, in inundation zones.