HARRIS COUNTY HAZARD MITIGATION PLAN UPDATE

Project Scope of Work

Phase 1: Organize and Review

Under Phase 1, Tetra Tech will work with the County and all planning partners to organize the key components for this plan update process. This includes the planning partnership and a designated Steering Committee to oversee the plan update scope of work. The RFP has clearly identified the targeted planning partnership for this effort that includes 33 municipal and special purpose district planning partners.

Tetra Tech recommends the following organizational structure to oversee this planning update process:

- **Core Planning Team (CPT):** The Core Planning Team would be made up of discipline leads from the Tetra Tech team as well as key staff from HCOHSEM. The disciplines represented on this team will include: risk assessment/GIS data, Planning Process, and Public outreach. This team would be organized such that there would be sub-working groups to the overall team structure aligned for each discipline. For example, there would be a GIS work group lead by the GIS/Risk assessment team lead that would coordinate the data mine of all data needed for the development of the risk assessment for this plan. There would be a public outreach work group that would coordinate all the public engagement efforts for this process, and a planning process work group, that would coordinate the overall planning process. From project inception to completion, bi-weekly project coordination calls will be held by the CPT to discuss project status, identify issues in the planning process, review consultant deliverables and confirm meeting content for Steering Committee meetings discussed below. The role of the CPT as defined here would meet the same objectives of the mitigation Core Planning team (MCPT) and the GIS Risk Analysis Team (GIS-RAT) identified in the RFP.

- **Hazard Mitigation Steering Committee (SC):** A key component of this phase will be the establishment of a stakeholder Steering Committee (SC) that will play a principle role in the oversight of this plan update process. The role of the SC will be to make key milestone decisions on behalf of the planning partnership, while streamlining the process and adding process efficiencies to the overall process. The make-up of the SC will strive for a 50/50 split between governmental and non-governmental stakeholders within the Planning area (Harris County) and strive for representation for all planning partner types (i.e.: districts, Large cities, small cities, etc.). It will be important for this committee to have a manageable size so that quorums can be established that are achievable. The SC will operate under a set of ground-rules that they established, and their meetings will be open to the public and advertised as such under the public outreach strategy (phase 3) for this plan update.

As with the CPT, the SC will have work groups established under its umbrella to address specified areas of interest in the overall process. For example, with 12 cities within Harris County participating in the Community Rating System (CRS) program, a work group would be formed to meet the CRS planning requirements for Activity 510, step 1. These work groups would meet separately from the SC and report back to the SC on key milestones and deliverables from their meetings. All SC meetings will be facilitated.

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**Phase 1 Elements**

- Form Core Planning Team (CPT)
- Form Steering Committee (SC)
- Kick-off meeting
- Planning Partner Bulletins
- Facilitate Steering Committee meetings
- Agency Coordination
- Plan/programs/Studies review
by the CPT. The defined roles and objectives for the SC would meet those objectives identified in the RFP for the Local Mitigation Planning team (LPT).

Once the planning organizational oversite structure is in place, the CPT will begin the facilitation of the plan update process. The 1st step in this process will be to engage the planning partnership. This will be done initially via a planning partner kick-off meeting. All currently committed planning partners as well as any potential new planning partners will be invited by the CPT to a kick-off meeting targeted to be conducted within 30-days of contract execution. The purpose of this meeting will be to:

- Present the plan update scope of work to the planning partnership.
- Introduce the CPT and SC and explain their roles in the plan update process
- Present the planning partner expectations and explain the definition of “participation”
- To seek formal commitment in the form of a notice of intent to participate
- To present data needs (wish list) for the risk assessment
- Introduce the planning partner bulletin methodology

As stated above, all planning partners will be asked to formally commit to this plan update process via a NOI process that will stress their understanding of what will be expected of each planning partner to meet the participation requirement as defined by the CPT for this process. Each NOI will designate a lead point of contact for each planning partner and provide certification that each partner agrees to the expectations identified.

To build upon the momentum of the Kick-off meeting, the CPT will deploy a “Planning Partner Bulletin” (see Exhibit 3) that will be distributed within 30 days of the conclusion of the Kick-off meeting. Additional bulletins will be distributed to the partnership throughout the course of the planning process to keep them apprised of plan development milestones. These bulletins will also be posted to the County’s hazard mitigation plan website as a form of public outreach.

Following the kick-off meeting, the Steering Committee (SC) process will commence. The SC will meet according to a regularly scheduled time frame that will be determined when establishing their ground-rules at the 1st SC meeting. It is assumed that the SC will meet at least monthly or more as needed during the plan update process. The purpose for these meetings will be to provide guidance to the CPT on key planning milestones such as: confirming goals and objectives for the plan, identifying a public outreach strategy for the overall process, defining critical facilities to be assessed, confirming a plan maintenance strategy for the plan and identifying a comprehensive range of mitigation alternatives that each planning
partner may consider in identifying their jurisdiction specific actions for the plan. All SC meetings will be facilitated by the CPT, open to the public and will be advertised as such.

Another crucial step that will occur under this phase will be agency coordination. It is important to note that there always outside agencies with stake in hazard mitigation within a planning area that are not actual planning partners or members of the SC. It is an important part of any mitigation planning process to identify who these stakeholders are and to give them an opportunity to participate in this process, or at a minimum, keep them apprised of plan development milestones. Examples of these types of stakeholders would include state or federal agencies with roles in community resilience and/or neighboring cities or counties outside of the defined planning area with similar risks and capabilities. Therefore, under this phase, the CPT will identify a list of coordinating agencies that will be kept apprised of all plan development milestones during this plan update process. This coordination will be predominately via e-mail, and each agency will be notified of key meeting dates and invited to participate. Most importantly, these coordinating agencies will be notified when a draft plan is ready for public review and comment and will be asked to provide review and comment.

Lastly under this phase, a review of existing studies, reports, and technical information will be performed to assimilate sources of information into the decision-making process. This will include a comprehensive review of all prior actions identified in the last plan update as well as a review of the current Texas State Hazard Mitigation Plan to assure consistency of this plan update with the goals, objectives and actions of that plan. Additionally, the initial plan will be reviewed by the Steering Committee to determine recommendations for changes and/or enhancements. Tetra Tech will document and record the elements of this phase for incorporation into the plan document.

**Phase 2: Identify Hazards/Perform a Risk Assessment**

Phase 2 will be the most involved phase of the plan update process. FEMA planning guidance indicates that comprehensive updates to the risk assessment portion of a Local Hazard Mitigation Plan will be required in plan updates if new technical data pertaining to a hazard have been recorded by a creditable source since the plan’s initial development. These data could include recent studies, mapping, and loss records. So, for example, the current effective Flood Insurance rate map (FIRM) for Harris County is dated 01/06/2017. This data was not likely used in the 2015 Harris County plan as the effective FIRM used in that plan was dated prior to this data. Therefore, for this plan update, the Flood Hazard Risk assessment must at a minimum use the floodplain extent and location from the 2017 FIRM for the Flood Hazard risk assessment. Under this phase, Tetra Tech will assist the partnership in identifying the characteristics and potential consequences of the hazards that may impact or have historically affected the planning area. This will include at a minimum, those hazards addressed by the prior plan.

Tetra Tech will perform a thorough assessment of each hazard, as well as the vulnerability of the planning area to each hazard identified, using tools such as GIS/HAZUS, benefit-cost analysis tools, and the best available scientific data and historical/local knowledge of past occurrences. At a minimum, a map delineating each hazard area (for those hazards that have a clearly defined extent and location), a description of each hazard (including potential depths, velocities, magnitudes, frequencies, etc.), and a discussion of past events will be prepared. Because this effort will be submitted to FEMA as an update to the current approved plan for the County, the updated risk assessment must include:

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<th>PHASE 2 ELEMENTS</th>
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<tbody>
<tr>
<td>✓ Data acquisition and gap analysis</td>
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<td>✓ Identification of the hazards of concern</td>
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<tr>
<td>✓ Map extent and severity of countywide hazards</td>
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<tr>
<td>✓ Perform vulnerability analysis</td>
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<tr>
<td>✓ New development risk analysis</td>
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<tr>
<td>✓ Format data for public involvement strategy</td>
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</tbody>
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• Best available data to identify extent and location of hazard events for which the planning area is susceptible (Note: natural hazards are mandatory, non-natural hazards are optional)
• Historical review of events that have occurred during and the period of the initial risk assessment be included in the update process
• Probability of occurrence or frequency of hazard events based on new data or occurrences

Also under each hazard, a vulnerability analysis will be performed that will include an inventory of the number and type of structures at risk; the impact on life, safety, and health and the need and procedures for warning and evacuation; the identification of critical facilities and the impact of the hazard on those facilities; and a review of the development/ redevelopment trends projected for the future in each identified hazard area. In addition, the flood hazard risk assessment will include a review of all FEMA-identified repetitive loss properties within the planning area as required under the CRS and HMA programs. This review will include the delineation of repetitive loss areas for each municipal partner, a determination of the cause of repetitive flooding, and a building count of the number of structures within these repetitive loss areas.

It should be noted that FEMA has established a priority in its plan reviews that any plan update clearly documents any change in risk that has occurred since the development of the last plan. The basis for this analysis is to look at all new development that has occurred since the last plan to determine what if any, of that new development occurred within identified hazard areas, and, subsequently, what is the vulnerability of that new development. Tetra Tech has developed a standard protocol for this analysis for all its planning efforts.

Phase 2 will assure that each participating planning partners’ risk and vulnerability is addressed in the overall risk assessment. This will be accomplished using established templates that will walk each partner through the required steps of risk assessment. Existing data and personal interviews will be used to accomplish this phase. The primary tool utilized in the development of this risk assessment will be Hazus-MH (version 4.2). This will be a level-2, user-defined analysis supported by information provided by the county such as County Assessor datasets, topography data, hydrology data, and soils data. Hazus will be used to assess the dam failure, earthquake, and flood hazards (both coastal and riverine). Additionally, a Sea Level Rise exposure analysis will be performed using best available data. For those hazards not addressed by the Hazus model, Hazus outputs will be modeled using GIS applications (applying damage functions to an inventory exposed to a hazard). The results of this phase will represent a significant enhancement of the Hazus analysis performed in the original plan. All Hazus models, their data inputs and their results will be provided to Harris County to update their existing data sets as well as training for appropriate personnel on their use.

Tetra Tech will generate and analyze the output reports of Hazus based on the hazard scenarios run by the model and in some cases, using historical, anecdotal, and other information to evaluate how hazards may cause losses. Using Hazus, we will provide quantitative loss estimates, where feasible; in other cases, we will use FEMA, Texas Division of Emergency Management Services and other available guidance to estimate potential exposure, losses, and impacts in a qualitative manner, clearly specifying our sources, assumptions, and methodologies in all cases. We will use illustrative means including histograms, maps, and other diagrams to present and summarize information. These maps and illustrations also can be used to support public meetings and outreach regarding planning efforts. Hazus data will be formatted such that it can support both the plan content as well as the public involvement strategy identified under Phase 3.

### Phase 3: Public Involvement Strategy

Section 201.6.b of 44 CFR states that “the planning process will include: an opportunity for the public to comment on the plan during the drafting stage and prior to adoption.” It does not stipulate how this public
involvement must occur. FEMA guidance documents suggest using multiple media outlets such as the Internet, brochures, fliers, questionnaires, and public meetings. Any or all of these approaches qualify as “public involvement” according to the DMA.

Based on our past planning experience, Tetra Tech has found it is often difficult to get the public actively involved in pre-disaster planning because there is limited perceived risk. As such, it can be difficult to get citizens involved in the process and to attend a traditional public meeting. Obviously, this point can be skewed by the occurrence or perception of an imminent disaster. It is important to note that we do anticipate a very engaging “public” in this planning effort due to the lingering effects from Hurricane Harvey. We would view this as a good thing. Tetra Tech has had a great deal of success by proactively taking the issues to the citizens to seek their input, rather than relying on the public to bring their issues to us. We have been successful in this regard by using questionnaires that ask quantifiable questions on risk and vulnerability, and by utilizing Internet-based tools such as notifications, web-postings, and on-line surveys as well as social media.

Our approach would use a truly multi-media approach during the initial stages of the plan’s development, focused on getting as many responses from the public as possible. The outreach strategy will be a singular effort that covers the entire planning area, thus eliminating redundancy within the planning area, and saving financial resources for other key phases of the project. It is important to note that the development of this strategy will evolve from the Steering Committee and be based capabilities from within the partnership. This will be a multi-media strategy that will strive to utilize:

- Hazards mitigation questionnaire tailored to the needs and issues of the planning area. This questionnaire would be disseminated to target audiences determined appropriate by the Steering Committee.
- Web-based methods to solicit input on draft elements of the plan such as the risk assessment, jurisdictional specific chapters, mitigation catalog, and the draft plan.
- Social Media tools such as Facebook, Twitter and Next-door
- Articles that describe the plan, purposes for planning, and identified issues within the planning area will be prepared and disseminated via press releases to media outlets within the planning area.
- Public meetings/workshops
- The utilization of Hazus-MH workstations to convey property specific risk and vulnerability at public meetings and open houses.

Tetra Tech will strive to establish a strategy that seeks to engage the public twice throughout the planning process. The 1st being early in the process to share the results of the risk assessment and gauge the public’s perception of the risk. The 2nd would be to present the draft plan and provide the public the opportunity to provide comment on the draft plan. Tetra Tech will document all public outreach efforts for inclusion in the plan and documentation of their findings.

**PHASE 3 ELEMENTS**

- Perform public outreach capability assessment
- Facilitate development of public involvement
- Implement strategy:
  - Public response through questionnaire
  - Website postings and outreach
  - Press releases
  - Public meetings
  - Utilize social media
  - Hazus work-stations
Phase 4: Identify Goals, Objectives, Capabilities and Actions

After the hazard identification and risk assessment documentation have been completed and reviewed by the SC, the CPT will work with the SC to confirm a vision for the plan, goals, objectives, capabilities to implement actions, a comprehensive range of alternatives to be considered by the plan and then finally, the mitigation action plan. The 2015 Harris County plan will provide the basis for this phase by look at the goals identified by that plan and determining if they are still relevant for this plan update. The 2015 plan identifies a Mission statement and 7 goals. No objectives were identified. Under this phase, the SC will review these plan components and ask:

- Are they still relevant to the current conditions in Harris County?
- Are they measurable?
- Is there anything missing?

Once these planning components have been confirmed, a range of mitigation alternatives and actions on a hazard-by-hazard basis will be created. Actions that provide multi-objective risk reduction will be encouraged. Information obtained during the risk assessment as well as from the public involvement strategy will be used to create a mitigation catalog. The basis for this catalog will be a facilitated session(s) with the SC identifying strengths, weaknesses, obstacles, and opportunities within the County. This catalog can then be used by each Planning Partner to guide their decision making regarding mitigation actions. In essence, the catalog will represent the alternatives analysis in the plan, a required component for both DMA and CRS compliance. Once the mitigation catalog has been assembled, the planning team will facilitate workshop with appropriate County Departments and stakeholders to identify a Hazard Mitigation Strategy for the plan.

A key step under this phase will be the performance of a core capability assessment of key core capabilities to implement mitigation actions within the Planning area. Using tools and templates developed by Tetra Tech, the CPT will deploy an assessment of the legal/regulatory, technical and financial capabilities of the Planning Area to implement mitigation actions. Additionally, this assessment will look at the Planning Area’s public education and outreach capabilities as well as compliance with the programmatic requirements of the National Flood Insurance Program (NFIP) as required under FEMA HMA program of those jurisdictions that participate in the NFIP.

To support the NFIP programmatic capability assessment under this phase, Tetra Tech will deploy its BATool SM evaluation of the floodplain management programs for those planning partners looking for an evaluation of their NFIP compliance status for current or future CRS participation. This will be a voluntary assessment. The results of these evaluations will be utilized to identify gaps in floodplain management program capability that can be used to identify actions for the plan, and to support the CRS impact analysis that will be prepared for both communities under this phase. Each community that participates in this evaluation will receive a set of improvement statements that will provide the jurisdiction guidance on how to address gaps identified in their floodplain management program. All municipal planning partners will be advised of this opportunity at the “kick-off” meeting discussed on phase 1 of this scope of work. Those planning partners wishing to take advantage of this assessment will notify the CPT via the notice of intent (NOI) process.

The principal objective for this phase is the development and prioritization of a hazard mitigation strategy for the plan. This strategy will reduce the effects of hazards on both new development and existing

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**Phase 4 Elements**

- Confirm Mission Statement
- Confirm Goals
- Identify Objectives (if applicable)
- Strengths, Weaknesses, Obstacles and Opportunities (SWOO) Analysis session
- Prepare Mitigation Catalog
- Core capability assessment
- BATool SM evaluation (voluntary)
- Prioritization schedule
inventory and infrastructure. As part of the mitigation alternative development step, Tetra Tech will introduce the planning partners to the Tetra Tech methodology for prioritizing the actions based on a review of project benefits versus project costs as required and for quantifying priority.

**Phase 5: Develop Plan for Monitoring, Evaluating, and Updating the Plan**

Under Phase 5, the CPT will work with the Steering Committee to develop a plan for monitoring, evaluating the performance, and laying the ground work for the next 5-year update. This is often referred to as the Plan Maintenance Strategy. The strategy developed will be regionally specific to the Harris County Planning Partnership and will be based upon the needs and capabilities of the partnership as identified by the Steering Committee via a facilitated process.

The strategy will, at a minimum, meet DMA requirements; however, the CPT will provide the Steering Committee with guidance on meeting the more stringent progress reporting standards required by CRS. Responsive to these requirements and to ease the burden on the Planning Partnership at the time of the next update, Tetra Tech will develop a plain maintenance component that addresses key implementation milestones during the 5-year plan performance period. The key component for this maintenance will be the deployment of the progress reporting tool, which is an extension of Tetra Tech’s BAToolSM Program discussed in this proposal. This tool is designed so that each Planning Partner that has actions identified in the plan can report on the status of those actions during an established reporting period. The reporting period will be identified by the Steering Committee. The BAToolSM Program allows the County to automate much of the administrative burden of plan maintenance. Exhibit 2 shows screen shots from the BAToolSM Program that would be adapted to meet the County’s needs and capabilities for plan sustainment.

**Exhibit 2. BAToolSM Screen Shots**

- **Secure Sign-in Screen**
- **Progress Report Tool Home Page**
For this scope of work, Tetra Tech will provide the BAToolSM Program initiation, and one year of functional progress reporting for the costs reflected is Section III of this proposal. The continuation of support via the BAToolSM beyond year one progress reporting is dependent upon the County’s desire to continue the use of the tool, and receipt of the annual subscription fee for BAToolSM Program usage.

Phase 6: Assemble the Updated Plan

Using the information gathered in the first five phases, Tetra Tech will assemble all of Volume I of the regional plan and facilitate the assembly of Volume II. Tetra Tech will be listed as the author of the mitigation plan and the document will contain the following information:

- Brief introduction, including context for and description of the need for the mitigation plan. This will include a description of the planning process followed in the development of the mitigation plan and document all public involvement.
- Description of the operational area’s mission, goals, programs, and policies, and an analysis of its capabilities to carry them out.
- Brief description of the history, physical setting, land-use patterns, and development trends of the area to be covered by the mitigation plan.
- A profile chapter on Climate Change and the possible impacts of climate change on the identified hazards of concern addressed by the plan.
- List and assessment of the hazards and risks to which each of the participating partners is vulnerable.
- Summary of current federal, state, and local programs and policies that address the identified risks. Tetra Tech will also include a prioritized list of recommended strategies, programs, policies, and actions to address identified hazards and risks. The review of mitigation activity alternatives will be conducted for each hazard. Additionally, Tetra Tech will identify those persons responsible for implementing recommendations, approximate cost of and potential funding sources for implementing recommendations, cost effectiveness of recommendations, and suggested timeline for implementing recommendations.
- Strategy for evaluating, adopting, and implementing the mitigation plan. The draft Action Plan will identify agencies and departments responsible for implementation, targeted timeframe for implementation, and possible funding mechanisms. Tetra Tech will include documentation that the participating partners have met the requirements of DMA, as described in the Federal Register (Volume 67, Numbers 38 and 190, dated February 26, 2002 and October 1, 2002, respectively).
• Other descriptions, documentation, and mitigation plan elements as required, meeting state, and FEMA approval.
• Summary of how the community will monitor progress of the mitigation plan and activities and an established timeline for future updates, including an Annual Evaluation Report.
• The LHMP shall describe the need for changes to the risk assessment and what changes were made in comparison to the initial plan. This would include any changes to exposure or probability of occurrence caused by the occurrence of events during the performance period.
• The LHMP shall illustrate any changes to risk exposure caused by changes in land use from annexation, new development, or other relevant factors to be determined.
• The LHMP shall illustrate any changes to the action plan and include an explanation of the status of the action items, and what changes were made.
• The LHMP shall identify the completed, deleted, or deferred actions or activities from the previously approved plan as a benchmark for progress. Further, the updated plan shall include in its evaluation and prioritization any new mitigation actions identified since the previous plan.
• The LHMP shall include an analysis of the prior plans schedule for monitoring, evaluating, and updating the plan, and make any recommendations for changes to the plan maintenance process.

Each of these elements will be applicable to each participating planning partner. Once again, this will be achieved by using tools that will generate annexes for each partner ranking risk, quantifying vulnerability by hazard, and identifying and prioritizing mitigation initiatives specific to each jurisdiction. Partners will be familiarized with how to complete their annex via a phased deployment tools to support their development and a mandatory Jurisdictional Annex workshop to support the development of Jurisdiction specific actions for each annex.

Because it will be a large scale, multi-jurisdictional plan, the final plan document will be laid out such that the plan will be segregated into two volumes. Volume I will contain all information that applies to the whole planning area (operational area) such as description of the planning process, risk assessment, goals, and objectives, and plan maintenance strategy. Volume II will contain those elements that are “jurisdiction specific” such as the jurisdictional capability assessment, risk ranking, and mitigation strategy. Volume II will include a jurisdictional annex for each participating local government that fully meets their “participation” requirements discussed under phase 1 of this scope of work. These annexes will meet DMA requirements for each jurisdiction. Volume II will also include the “linkage” procedures discussed under Phase 1. Examples of how this approach works can be viewed on the websites for Cook County, IL and King County, WA at:

- https://www.cookcountyhomelandsecurity.org/hazard-mitigation-plan

Templates with detailed instructions will be provided to each participating planning partner to guide their completion of their jurisdictional annex. These templates will be deployed in three phases over the planning process. The Phase 1 and 2 templates will be deployed via e-mail to all planning partners that submitted a letter of intent to participate (LOI) in this planning process during the first four months of the planning process. Phase 3 will be presented during a mandatory workshop(s) in and around month five of the planning process. If needed, two workshops will be held, one for municipal partners and one for special district partners, to walk each partner through completion of the template. This jurisdictional annex process will represent the participation requirement specified under FEMA regulations. All planning partners seeking compliance from a multi-jurisdictional plan must participate in the plan development process. This prescribed process will meet this requirement. A timeline for completion will be provide at these workshops. Failure to meet this timeline for completion will be considered a failure to
meet a key planning partner expectation, and therefore be deemed as a failure to meet the participation requirement.

One of the primary benefits of developing a LHMP is to enable a jurisdiction to become grant eligible. Grant eligibility starts with good projects, and Tetra Tech’s expertise in this arena is unsurpassed. In the current economic situation, and with grant funds quickly dwindling, the ability to obtain grant dollars has become increasingly important. Tetra Tech team members assigned to this project have developed expertise in not only the development of sound strategies, but also in the area of hazard mitigation grant applications under all five FEMA Hazard Mitigation Grant programs. Those same project team members have also been utilized by FEMA as beta testers for the benefit cost analysis re-engineering (BCAR) model prior to its deployment in 2009.

Once those strategies have been developed, as an added value, Tetra Tech will provide a training session for all participating local jurisdictions for FEMA’s Benefit-Cost Analysis Tool. Jurisdictions will be invited to attend this training, bringing with them their projects, and Tetra Tech team members will work with the jurisdictions to develop a completed BCA that can then be utilized to support future grant applications. While this assistance does not include any engineered studies or other studies necessary, for those projects already being processed, this training will not only help expedite the grant application process but will provide the jurisdictions with the knowledge of how to complete a BCA. Please note that using FEMA’s BCA tool is not a requirement under the FEMA plan review tool. As such, this training could and most likely would be held after plan submittal to Texas Division of Emergency Management (TDEM) and FEMA in the interest of meeting timeline constraints. Therefore, this training will not impact the plan submittal timeline.

Phase 7: Plan Review and Adoption

Under Phase 7, a first draft of the updated plan will be presented to the SC for review and approval. Changes desired will be incorporated into a second draft plan that will be forwarded to appropriate agencies identified under Phase 1 for their review and comment. This will include the Harris County Attorney’s office review as requested in the RFP. This dissemination will occur simultaneous with a final public comment period identified under Phase 3 of this scope of work. Prior to this distribution, the CPT will perform an in-house review of the draft plan using the LHMP Review Tool used by FEMA and TDEM reviewers to determine the mitigation plan’s compliance with the DMA requirements. All comments received during this public comment period will be documented and incorporated as appropriate by the CPT. At the completion of the final public comment period, the submittal draft plan will be prepared and submitted to TDEM with a request for pre-adopter review and approval. TDEM will be responsible for submittal of the plan to FEMA Region VI after it completes its review.

Once approval pending adoption (APA) has been granted by the review agencies, the adoption phase of the plan’s development process will begin. Once in the adoption phase, all Planning Partners will be given a timeframe (estimated to be 30 to 45 days at the most) to adopt the plan. Sample resolutions for adoption will be provided to all Planning Partners. The CPT Team will track the adoption status of all partners and prepare the adoption documentation package to be submitted to TDEM and FEMA Region VI for final plan approval.