

1 INTRODUCTION AND PLANNING PROCESS

1	INTRODUCTION AND PLANNING PROCESS.....	1.1
1.1	Purpose.....	1.1
1.2	Background and Scope.....	1.1
1.3	Plan Organization.....	1.2
1.4	Planning Process.....	1.3
1.4.1	Multi-Jurisdictional Participation.....	1.5
1.4.2	The Planning Steps.....	1.7

1.1 PURPOSE

Hazard mitigation is “any action taken to reduce or eliminate the long-term risk to human life and property from natural hazards.” The work done to minimize the impact of natural hazard events to life and property is called Hazard Mitigation. Montgomery County and its nine participating jurisdictions and three school districts developed the multi-jurisdictional local hazard mitigation plan update to reduce losses from future hazard events and to ensure that the county and its participating jurisdictions remain eligible for mitigation grants. Jurisdictions and school districts that choose not to participate will not be eligible for mitigation planning and pre-disaster planning grants.

1.2 BACKGROUND AND SCOPE

This document is the 5-year update of a plan that was approved on June 17, 2015. The plan and the update were prepared pursuant to the requirements of the [Robert T. Stafford Disaster Relief and Emergency Act \(Public Law 93-288\) as amended by the Disaster Mitigation Act of 2000 \(Public Law 106-390\)](#) and the implementing regulations set forth by the Interim Final Rule published in the *Federal Register* on February 26, 2002, ([44 CFR §201.6](#)) and finalized on October 31, 2007. (Hereafter, these requirements will be referred to collectively as the Disaster Mitigation Act, or DMA.) This plan update results in eligibility for the Federal Emergency Management Agency (FEMA) Hazard Mitigation Grant programs. Additional guidance was provided by FEMA’s [Local Mitigation Planning Handbook, March 2013](#) and FEMA’s [Local Mitigation Plan Review Guide, October 1, 2011](#).

The following local governments and school districts participated in both the original plan as well as the plan update, which allows them to adopt the plan and secure eligibility for Hazard Mitigation Grant funding they could not otherwise obtain. While the Gasconade School District, listed below, is located in Gasconade County it encompasses a portion of the lower part of Montgomery County. Only the assets located in the county of multiple county entities are considered part of that county’s plan, therefore, the Gasconade District participates in Hazard Mitigation Plans of both Montgomery County and Gasconade County.

City of Bellflower
City of Jonesburg
City of Montgomery
City of Wellsville

City of High Hill
City of Middletown
City of New Florence
Village of McKittrick

In addition to protecting life and property and securing grant funding eligibility, the plan is useful for incorporating hazard mitigation planning and principles into other documents such as zoning regulations and land use plans.

1.3 PLAN ORGANIZATION

This update, the 2020 Hazard Mitigation Plan, involved review, evaluation, and amendment of the prior plan updated in 2015. It addresses the same natural hazards that were addressed in the 2015 plan. The select few man-made hazards that were included in the 2015 plan are carried forward into this plan.

- Chapter 1: Introduction and Planning Process
- Chapter 2: Planning Area Profile and Capabilities
- Chapter 3: Risk Assessment
- Chapter 4: Mitigation Strategy
- Chapter 5: Plan Implementation and Maintenance
- Appendices

It should be noted that the Missouri State Emergency Management Agency; SEMA, directed a new formatting style for the updated plan which required significant content to be rewritten and reorganized. However, this resulted in no significant changes to the content of the plan from the 2015 Hazard Mitigation plan. The table below illustrates only the significant changes made to the content of the plan.

Table 1.1. Changes Made to Plan Update

Plan Section	Summary of Updates
Chapter 1 - Introduction and Planning Process	Updated members of the Mitigation Planning Committee (MPC).
Chapter 2 - Planning Area Profile and Capabilities	Updated demographics for planning area.
Chapter 3 - Risk Assessment	Updated demographics and related data for planning area. Combined extreme heat and extreme cold into one hazard; extreme temperatures.
Chapter 4 - Mitigation Strategy	The mitigation category of each action was added to the action worksheets. Many action plans were deleted.

Plan Section	Summary of Updates
Chapter 5 - Plan Implementation and Maintenance	Updated MPC meetings for evaluating and updating the plan and added quantifiable measures to ensure progress is tracked from year to year.

1.4 PLANNING PROCESS

Montgomery County contracted with the Boonslick Regional Planning Commission (BRPC) through SEMA’s Scope of Work agreement and participated fully in the preparation of the 2015 and the 2020 Hazard Mitigation Plans. BRPC’s responsibilities under the scope of work include the following:

- Assist in establishing a Mitigation Planning Committee (MPC) as defined by the Disaster Mitigation Act (DMA) and assist Montgomery County in keeping the committee membership current.
- Assess the adherence to the process set forth in the previously approved plan for maintenance, that is, did the MPC meet regularly as specified in the prior plan and did a standing committee meet in the interim to set forth any changes in the MPC membership and procedures since adoption of the previous plan.
- Ensure the updated plan meets the DMA requirements as established by federal regulations and follows the most current planning guidance of the Federal Emergency Management Agency (FEMA).
- Facilitate the entire plan development process.
- Identify the data that MPC participants could provide and conduct the research and documentation necessary to augment that data.
- Assist in soliciting public input.
- Produce the draft and final plan update in a FEMA-approvable document and coordinate the Missouri State Emergency Management Agency (SEMA) and (FEMA) plan reviews.
- Ensure that all participating jurisdictions, including school and special districts, are represented on the MPC, whether it’s by direct or indirect participation. If indirect participation is used, set forth the parameters established for ensuring that the jurisdiction represented is kept apprised of MPC events and milestones. Active participation in the plan development effort is of paramount importance.

Table 1.2. Jurisdictional Representatives of Montgomery County MPC

Name	Title	Jurisdiction/Agency/Organization
Michael Roesner	EMA Director	Montgomery County
Donna Viehmann	County Flood Plain Manager	Montgomery County
Kathy Hancock	County Clerk	Montgomery County
Paul Korman	Sanitarian	Montgomery County
Adele Jonas	City Clerk	City of New Florence
Dustin Hoener	Director Facilities	Gasconade County R-I
Michael Gray	Superintendent	Montgomery County R-II
Jessica Cobb	Secondary Principal	Wellsville-Middletown R-I
Rich Daniels	Commissioner	Montgomery County Commission

Name		Title	Jurisdiction/Agency/Organization
Ryan	Poston	Commissioner	Montgomery County Commission
Jody	LaBanca	911	Montgomery County
Joey	Los	Mayor	Village of McKittrick
Cathy	Maddux	City Clerk	Village of Rhineland
Jeannie	Martin	City Clerk	City of Bellflower
Sherry	Meyer	City Clerk	City of Jonesburg
John	Noltensmeyer	Commissioner	Montgomery County Commission
Carolyn	See	City Clerk	City of Wellsville
Kalani	Sexton	City Clerk	City of Bellflower
Doris	Vaughn	City Clerk	City of Middletown
Matt	Schoo	Director of Public Works	Montgomery County
Marilyn	Chandler	Alderwoman	City of Bellflower
David	Colbert	Administrator	Montgomery County Ambulance
Don	Cole	Administrator	Montgomery County Developmental Disabilities
Steven	Deves	City Administrator	City of Montgomery City
David	Ingle	Mayor	City of New Florence
Corey	Eye	Public Works Superintendent	City of Jonesburg
Rich	Daniels	Police Chief	City of Wellsville
Gary	Moore	Mayor	City of Middletown
Georgia	Scarborough	Council Member	City of Middletown
Bonnie	Nordwald	Mayor	City of New Florence
Keith	Reynolds	Firefighter	Montgomery County FPD
Robert	Sellenriek	Mayor	City of Jonesburg
Barnard	Schultz	Police Chief	City of Jonesburg
Howard	Steele	Mayor	City of Wellsville
Gary	Adams	Board President	City of Bellflower
Steve	Wehrle	Mayor	City of Rhineland
Halie	Lenk	EMS	Montgomery County Ambulance District

Jurisdictional representatives each bring a particular area of expertise to the team in the Six Mitigation Categories; Prevention, Property Protection, Natural Resource Protection, Emergency Services, Structural Flood Control Projects, and Public Information. Team members and their respective areas of expertise are listed on the following table which is consolidated from team member tables in Section 1.

Table 1.3. MPC Capability with Six Mitigation Categories

Community Department/Office	Prevention	Structure and Infrastructure Projects		Natural Systems Protection	Education and Awareness Programs	Emergency Services
		Property Protection	Structural Flood Control Projects			
Montgomery County EMD	✓	✓	✓	✓	✓	✓
County Floodplain Manager	✓	✓	✓	✓	✓	

Community Department/Office	Prevention	Structure and Infrastructure Projects		Natural Systems Protection	Education and Awareness Programs	Emergency Services
		Property Protection	Structural Flood Control Projects			
Gasconade County R-I Director of Facilities	✓	✓	✓	✓	✓	✓
Montgomery County R-II Superintendent	✓	✓	✓	✓	✓	✓
Wellsville-Middletown R-I Principal	✓	✓	✓	✓	✓	✓
County Commissioner	✓	✓	✓	✓	✓	✓
County Commissioner	✓	✓	✓	✓	✓	✓
County Commissioner	✓	✓	✓	✓	✓	✓
County 911		✓				✓
City Clerk - Middletown					✓	
City Clerk – Bellflower					✓	
City Clerk – Jonesburg					✓	
City Clerk - Wellsville					✓	
City Clerk – Rhineland					✓	
City Clerk – High Hill					✓	
County Clerk – Montgomery					✓	
City Administrator – Montgomery City					✓	
Mayor – Village of McKittrick					✓	
County Sanitarian	✓	✓	✓	✓	✓	
County Public Works	✓	✓	✓	✓	✓	
Mayor – Village of Rhineland					✓	
Police Chief – City of Wellsville	✓	✓	✓	✓	✓	✓
Council Member – Middletown					✓	✓
Mayor – Middletown					✓	✓
Council Member – Jonesburg					✓	
Police Chief, Jonesburg	✓	✓	✓	✓	✓	✓
Area Engineer - MoDOT	✓	✓	✓	✓	✓	✓
Callaway Energy Center	✓	✓	✓	✓	✓	✓
Callaway County EMA	✓	✓	✓	✓	✓	✓
Audrain County EMA	✓	✓	✓	✓	✓	✓
Warren County EMA	✓	✓	✓	✓	✓	✓
Lincoln County EMA	✓	✓	✓	✓	✓	✓
Gasconade County EMA	✓	✓	✓	✓	✓	✓
Citizen Volunteers	✓				✓	✓
Firefighters	✓	✓			✓	✓

1.4.1 Multi-Jurisdictional Participation

The Disaster Mitigation Act requires that each jurisdiction participate in the planning process and officially adopt the multi-jurisdictional hazard mitigation plan. A Hazard Mitigation Planning

Committee (MPC) was created that includes representatives from each participating jurisdiction, departments of the county, school districts, and other agencies responsible for making decision in the plan and agreeing upon the final content. The Montgomery County Emergency Management Director, along with BRPC staff, solicited membership with the MPC through updated distribution lists of jurisdictional representatives and stakeholders, and advertised for additional stakeholders through display ads in local newspapers. In addition, BRPC staff and the Montgomery County Emergency Management Director reached out through press releases to local newspapers and radios stations, and posted bulletins at strategic locations. The Boonslick Regional Planning Commission Executive Director also briefed the board's general membership committee on the HMP status. Data Collection Questionnaires were distributed to jurisdictions and school districts to verify and append.

Once formed, the MPC contributed to the planning process by providing facilities for meetings, attending and participating in meetings, collecting and reporting data and progress of current mitigation actions, determining new mitigation strategies, reviewing drafts, and coordinating and assisting with public involvement and plan adoptions. Jurisdictions are also required to eliminate from further consideration those actions from the previously approved plan that were not implemented because they were impractical, inappropriate, not cost-effective, or were otherwise not feasible.

Minimum participation of each jurisdiction represented requires that the participant provide information to support the plan update through one or more of the following methods;

- Appoint a representative to attend scheduled meetings and act in his or her stead when necessary and/or schedule meetings with BRPC staff for data collection, risk assessment, and mitigation strategy updates when necessary.
- Communicate with BRPC staff through email, phone, fax, or other electronic measures concerning data collection, risk assessment, and mitigation strategy updates.
- Participate in a minimum number of specified meetings, including planning area wide MPC meetings, by either direct participation, authorized representation, or by face to face or electronic communications with BRPC staff;
- Provide to the MPC sufficient information to support plan development by completion and return of Data Collection Questionnaires and validating/correcting critical facility inventories;
- Provide progress reports on mitigation actions from the previously approved plan and identify additional mitigation actions for the plan;
- Review and comment on plan drafts;
- Actively solicit input from the public, local officials, and other interested parties about the planning process and provide an opportunity for them to comment on the plan;
- Provide documentation to show time donated to the planning effort (if a FEMA planning grant was awarded to the County); and
- Act with their respective jurisdiction to formally adopt the mitigation plan.

Most Montgomery County jurisdictions are staffed by part-time employees and volunteers whose busy schedules make meeting attendance difficult. While it is important to have full and active participation during meetings, it is equally important to ensure that all jurisdictions and stakeholders have an opportunity to be heard. To that end, Montgomery County, BRPC, and the MPC make every attempt to allow for alternate methods of participation, many of which are listed above.

Table 1.4. Jurisdictional Participation in Planning Process

Jurisdiction	Meeting #1	Meeting #2	BRPC Staff Liaison Meeting	Data Collection Questionnaire Response	Update / Develop Mitigation Actions	Formal Plan Adoption
Montgomery County	X	X	X	X	X	
Bellflower	No	No	X	X	X	
High Hill	No	No	X	X	X	
Jonesburg	No	No	X	X	X	
McKittrick	No	No	X	X	X	
Middletown	X	X	X	X	X	
Montgomery City	X	No	X	X	X	
New Florence	X	No	X	X	X	
Rhineland	No	No	X	X	X	
Wellsville	No	No	X	X	X	
Montgomery County R-II	No	No	X	X	X	
Wellsville-Middletown R-I	X	No	X	X	X	
Gasconade County R-I	No	No	X	X	X	

1.4.2 The Planning Steps

FEMA’s Community Rating System (CRS) planning steps, shown in Table 1.5, were used as a template for planning by the MPC. The 10-step CRS process allows the plan to meet funding eligibility requirements of the Hazard Mitigation Grant Program, Pre-Disaster Mitigation Program, and Flood Mitigation Assistance Program as well as qualify for points under Activity 510 for Mitigation Plans, under the Community Rating System.

Throughout the planning process the MPC utilized FEMA’s Local Mitigation Planning Handbook (March 2013), Local Mitigation Plan Review Guide (October 1, 2011), and Integrating Hazard Mitigation Into Local Planning: Case Studies and Tools for Community Officials (March 1, 2013).

The following table shows how the CRS process aligns with the Nine Task Process outlined in the 2013 *Local Mitigation Planning Handbook*. Actions taken during the 10-step process are detailed following the table.

Table 1.5. County Mitigation Plan Update Process

Community Rating System (CRS) Planning Steps (Activity 510)	Local Mitigation Planning Handbook Tasks (44 CFR Part 201)
Step 1. Organize	Task 1: Determine the Planning Area and Resources
	Task 2: Build the Planning Team 44 CFR 201.6(c)(1)
Step 2. Involve the public	Task 3: Create an Outreach Strategy 44 CFR 201.6(b)(1)
Step 3. Coordinate	Task 4: Review Community Capabilities 44 CFR 201.6(b)(2) & (3)

Community Rating System (CRS) Planning Steps (Activity 510)	Local Mitigation Planning Handbook Tasks (44 CFR Part 201)
Step 4. Assess the hazard	Task 5: Conduct a Risk Assessment 44 CFR 201.6(c)(2)(i) 44 CFR 201.6(c)(2)(ii) & (iii)
Step 5. Assess the problem	
Step 6. Set goals	Task 6: Develop a Mitigation Strategy 44 CFR 201.6(c)(3)(i); 44 CFR 201.6(c)(3)(ii); and 44 CFR 201.6(c)(3)(iii)
Step 7. Review possible activities	
Step 8. Draft an action plan	
Step 9. Adopt the plan	Task 8: Review and Adopt the Plan
Step 10. Implement, evaluate, revise	Task 7: Keep the Plan Current
	Task 9: Create a Safe and Resilient Community 44 CFR 201.6(c)(4)

Step 1: Organize the Planning Team
(Handbook Tasks 1, 2, and 4)

- Activities began on December 6, 2018 with the initial meeting between the Montgomery County EMD and staff from BRPC. This meeting was used to strategize the project, organize a core team, begin to identify possible team members, and assign responsibilities. Considerable time was also spent reviewing past plans and discussing how to improve the overall process. A tentative sequence of events was discussed and approved. Refer to Appendix for Initial Meeting notes.
- The kick-off meeting was held at the New Florence Ambulance Station on March 21, 2019. Direct mail / email, newspaper display advertisements, and printed notices were used to announce the meeting and solicit attendance. Ultimately, there were seven members of jurisdictional and stakeholder representatives present as well as the Montgomery County EMD, Michael Roesner; and BRPC liaisons Krishnapriya Kunapareddy and Mark Cunningham. Mr. Roesner called the meeting to order and introduced Ms. Kunapareddy who gave a brief presentation that explained the benefits of the Hazard Mitigation Planning process. She also discussed the schedule and what is expected from the team members. Refer to Appendix for Kick-Off Meeting notes.
- Data Collection Questionnaires were hand-delivered to each jurisdiction prior to the kick-off meeting. This allowed for Mr. Cunningham and Ms. Kunapareddy to brief the respondents on what was expected for completion of the questionnaires. The kick-off meeting allowed the respondents to ask follow-up questions about the questionnaires. The Data Collection Questionnaires are part of Appendix.
- Each step of the process requires an abundance of formal and informal communication with the kick-off meeting requiring the most to ramp up. The BRCP staff handled many calls from invitees regarding what is required of the team. By far the most effort involves coaching the jurisdictions in how to complete the Data Collection Questionnaires which are now even more detailed. BRPC, in conjunction with the Montgomery County EMD, pre-loaded the questionnaires and met with each jurisdiction prior to the kick-off meeting.

Table 1.6. Schedule of MPC Meetings

Meeting	Topic	Date
Initial Meeting	Strategizing and planning with core team	12/6/2018
Meetings with jurisdictions	Data collection questionnaire and planning process	December 2018; January 2019
Planning Meeting #1	Introduce MPC to the planning process and set expectations	3/21/2019
EMD Meeting	Reviewed goals and action plans	5/07/2019
Planning Meeting #2	Review action items and introduce draft plan	6/13/2019

Step 2: Plan for Public Involvement (Handbook Task 3)

The public was encouraged to participate in all steps of the planning process. Reference Appendix for particular meeting notices, press releases, and email announcements.

- Each planning meeting was notified via newspaper display advertisements, on the BRPC and Montgomery County websites, and by notices posted on public bulletin boards throughout venues of Montgomery County and its participating jurisdictions. During the meetings, BRPC staff encouraged attendees to participate in discussion.
- Press releases were distributed to local newspapers and radio stations.
- Face-to-face meetings were held with City Clerks to explain how the planning process works and what is expected of them to complete the Data Collection Questionnaire and adopting the final HMP.
- Press releases and meeting notices were provided to local government officials for review and distribution to their subordinates and peers.
- A concerted attempt was made to obtain public involvement. MPC meeting announcements were made in Montgomery County newspapers, and posted to the Montgomery County EMA and the Boonslick Planning Commission websites. In addition to paid display ads, roll-out news articles were published and meeting announcement publicized on participating jurisdiction's bulletin boards. However, no member of the general public attended any meetings nor did they ask for additional information. The above channels of communication were used to advertise the public comment session as well. No one asked for a copy of the plan to review.
- The final public comment period was between July and August, 2019. Newspaper display advertisements, press releases, and notices posted to websites and public bulletin boards announcement the opportunity and instructed the public on how to comment. Copies of the draft plan were available through the websites and hard copies were available at the Montgomery County Courthouse, Montgomery County Emergency Management Agency and at the BRPC office in Warrenton. Refer to Appendix for documentation.

Step 3: Coordinate with Other Departments and Agencies and Incorporate Existing Information (Handbook Task 3)

There are numerous organizations whose goals and interests integrate with hazard mitigation in Montgomery County. These stakeholders include the following entities:

- Neighboring communities
- Local and regional agencies involved in hazard mitigation activities
- Agencies with the authority to regulate development
- Businesses
- Academia
- Other private and non-profit interests

During this planning process, these stakeholders were given the opportunity to be involved. The email distribution lists and USPS mailing lists developed for this plan include representatives from all the above entities. In addition, these entities were exposed to the same press releases, display advertisements, and website notices as were the jurisdictional representatives. Moreover, the draft plan was shared with the Emergency Management Directors of the neighboring counties of Audrain, Callaway, Gasconade, Lincoln, Pike, and Warren during the public comment period. These EMDs were asked to review and comment on the plan.

State or federal agencies that are stakeholders in hazard mitigation were also invited to the planning sessions using the same tools and resources as cited above for the other invitees. The Contributors section of this plan lists the stakeholders that participated. Refer to Appendix for a complete list of all stakeholders that attended the planning meetings.

Coordination with FEMA Risk MAP Project

Risk Mapping, Assessment, and Planning (RiskMap) is a relatively new FEMA program that provides communities with flood information and tools they can use to enhance their mitigation plans and better protect citizens. Through more accurate flood maps, risk assessment tools, and outreach, RiskMap builds on Map Modernization and strengthens local ability to make informed decisions about reducing risks.

The following figure shows the status of Risk Mapping activity in Montgomery County; currently, in the data development stage as shown on the map's legend. In the data development stage, FEMA contracts for basic and enhanced analysis, redefinition and digital conversion (where needed) DFIRM production, and RiskMap products. Following several working sessions and input from jurisdictions, RiskMap development was added as an action plan to this update.

Step 5: Assess the Problem: Identify Assets and Estimate Losses (Handbook Task 5)

Assets for each jurisdiction were identified via variety of methods including; first-hand interviews, Data Collection Questionnaires, input from the county EMD and other first responders, data sources from the regional planning commission, and from the 2015 plan.

Where possible, losses were extrapolated from the most granular sources such as the 2010 census, FEMA Disaster Visualization, Missouri Department of Elementary and Secondary Education, Missouri Department of Transportation, U.S. Fish and Wildlife Department, Missouri Department of Conservation, Missouri Economic Development.ORG, USDA Census of Agriculture, Missouri GIS data, HAZUS, the Department of Agriculture Crop Losses, and the Data Collection Questionnaire. For losses not available from the above sources, exposure was taken from the 2019 State Plan.

Data Collection Questionnaires were hand delivered to city and county clerks and to school district administrators who were asked to complete the forms using first-hand knowledge and input from other most knowledgeable individuals. Information obtained from these questionnaires and from first-hand sources include regulatory, personnel, fiscal, and technical capabilities, and existing mitigation initiatives. Refer to Section 2, Planning Area Profiles and Capabilities.

Step 6: Set Goals (Handbook Task 6)

During the June 13, 2019 MPC meeting, BRPC staff and the Montgomery County EMD reviewed the 2015 plan goals with the committee who decided not to change the original three goals from the 2015 plan.

Step 7: Review Possible Mitigation Actions and Activities (Handbook Task 6)

Prior to Planning Meeting #2, met with County EMD to review the action plans from 2015 Plan. During the June 13, 2019 meeting, the Montgomery County EMD and the planning commission staff provided status of the mitigation actions and activities. Members of the committee shared status from their jurisdictions as well. New actions were suggested. MPC members were encouraged to continue forward only those actions that substantially address long-term mitigation solutions to the risks identified in the risk assessment and that the cost versus benefit of each solution should be considered.

Subsequently, the STAPLEE method was used to analyze and prioritize proposed actions. Members were provided a copy of the STAPLEE proposed by the planning commission staff and the Montgomery County EMD in the public comment draft of the plan. In addition, the FEMA publication, "Mitigation Ideas – A Resource for Reducing Risk to Natural Hazards" was given to the MPC at the kick-off meeting.

In summary, there are 1 to 2 completed actions depending on the jurisdictions, 36 deleted actions, and 1 to 4 continuing actions depending on the jurisdictions.

Step 8: Draft an Action Plan
(Handbook Task 6)

Proposed actions derived from the STAPLEE methodology was incorporated into the 2019 plan and presented to the MPC for their concurrence on June 13, 2019 during the final review and approval of the plan. The action plan is included in Section 4 and the STAPLEE forms in the Appendix.

Step 9: Adopt the Plan
(Handbook Task 8)

Following the public comment period and the review and approval of the draft by the team during the review process in July and August, the draft was finalized and presented to the city and county jurisdictions for adoption by their governing bodies.

Step 10: Implement, Evaluate, and Revise the Plan
(Handbook Tasks 7 & 9)

Plan Maintenance, included in Section 5, includes the overall strategy for plan implementation and monitoring/maintaining, was discussed and accepted by the MPC at the June 13 meeting in New Florence.