

## Appendix D – NCEM/FEMA Comments

## APPENDIX A: LOCAL MITIGATION PLAN REVIEW TOOL

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The *Local Mitigation Plan Review Tool* demonstrates how the Local Mitigation Plan meets the regulation in 44 CFR §201.6 and offers States and FEMA Mitigation Planners an opportunity to provide feedback to the community.

- The Regulation Checklist provides a summary of FEMA’s evaluation of whether the Plan has addressed all requirements.
- The Plan Assessment identifies the plan’s strengths as well as documents areas for future improvement.
- The Multi-jurisdiction Summary Sheet is an optional worksheet that can be used to document how each jurisdiction met the requirements of the each Element of the Plan (Planning Process; Hazard Identification and Risk Assessment; Mitigation Strategy; Plan Review, Evaluation, and Implementation; and Plan Adoption).

The FEMA Mitigation Planner must reference this *Local Mitigation Plan Review Guide* when completing the *Local Mitigation Plan Review Tool*.

<b>Jurisdiction:</b> Camden, Chowan, Currituck, Dare, Gates, Hertford, Pasquotank and Perquimans Counties	<b>Title of Plan:</b> Albemarle Regional Hazard Mitigation Plan	<b>Date of Plan:</b> 3/09/2015
<b>Local Point of Contact:</b> Billy Winn	<b>Address:</b> PO Box 536 Gatesville, NC 27938	
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<b>State Reviewer:</b> <a href="#">John Mello</a>	<b>Title:</b> <a href="#">Hazard Mitigation Planner</a>	<b>Date:</b> <a href="#">3/9/2015</a>
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<b>FEMA Reviewer:</b>	<b>Title:</b>	<b>Date:</b>
<b>Date Received in FEMA Region</b> <i>(insert #)</i>		
<b>Plan Not Approved</b>		
<b>Plan Approvable Pending Adoption</b>		
<b>Plan Approved</b>		

**SECTION 1:  
REGULATION CHECKLIST**

**INSTRUCTIONS:** The Regulation Checklist must be completed by FEMA. The purpose of the Checklist is to identify the location of relevant or applicable content in the Plan by Element/sub-element and to determine if each requirement has been ‘Met’ or ‘Not Met.’ The ‘Required Revisions’ summary at the bottom of each Element must be completed by FEMA to provide a clear explanation of the revisions that are required for plan approval. Required revisions must be explained for each plan sub-element that is ‘Not Met.’ Sub-elements should be referenced in each summary by using the appropriate numbers (A1, B3, etc.), where applicable. Requirements for each Element and sub-element are described in detail in this *Plan Review Guide* in Section 4, Regulation Checklist.

1. REGULATION CHECKLIST	Location in Plan (section and/or page number)	Met	Not Met
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>			
<b>ELEMENT A. PLANNING PROCESS</b>			
A1. Does the Plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction? (Requirement §201.6(c)(1))	Sec 2.2		
A2. Does the Plan document an opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, agencies that have the authority to regulate development as well as other interests to be involved in the planning process? (Requirement §201.6(b)(2))	Sec 2.6		
A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))	Sec 2.5		
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))	Sec 6		
A5. Is there discussion of how the community(ies) will continue public participation in the plan maintenance process? (Requirement §201.6(c)(4)(iii))	Sec 8		
A6. Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a 5-year cycle)? (Requirement §201.6(c)(4)(i))	Sec 8		

## 1. REGULATION CHECKLIST

Regulation (44 CFR 201.6 Local Mitigation Plans)

Location in Plan  
(section and/or  
page number)

Met  
Not  
Met

### **ELEMENT A: REQUIRED REVISIONS**

#### **NCEM Review:**

**A1b:** "The plan must list the jurisdiction(s) participating in the plan that seek approval."

**A1c:** "The Plan must provide, at a minimum, the jurisdiction represented and the person's position or title and agency within the jurisdiction."

**A1d:** "For each jurisdiction seeking plan approval, the plan must document how they were involved in the planning process. For example, the plan may document meetings attended, data provided, or stakeholder and public involvement activities offered. Jurisdictions that adopt the plan without documenting how they participated in the planning process will not be approved."

#### **Required Revisions:**

- First paragraph of 2.2 in addition to the County names, should also list the names of the 17 local participating jurisdictions. **Added on page 2**
- Table 2.1 lists the jurisdiction represented and the agency within the jurisdiction. The table must also include the person's position or title. **Added on page 2**
- The plan must document how the following jurisdictions were involved in the planning process: Town Of Gatesville, Town Of Cofield, Town of Como, City of Harrellsville, Town of Murfreesboro, and Elizabeth City. These jurisdictions do not appear to have representation in Table 2.1. **Added on page 5**
- Please document how each jurisdiction (all 25) was involved in the planning process. This can be achieved by documenting meetings attended or a narrative statement describing participation activities. Examples for Appendix B are attendance rosters, meeting agendas, meeting minutes if recorded. **See comment below regarding the Town of Hertford.**

**A4a:** "The plan must document what existing plans, studies, reports, and technical information were reviewed."

**A4b:** "The plan must document how relevant information was incorporated into the mitigation plan."

#### **Required Revisions:**

- The plan does document what existing plans, studies, reports, and technical information were reviewed and provides a description of each and what communities have each capability. However, Section 6 does not describe if or how relevant information from those existing capabilities was incorporated into the plan. Please describe the A4b requirement or identify where in the plan this information is located. **Identified in Section 6, Capabilities Assessment.**

**A6:** "Plan updates provide the opportunity to consider how well the procedures established in the previously approved plan worked and revise them as needed." *"Task 7" in the Local Mitigation Planning Handbook, March 2013, Page 7-1.*

#### **Required Revisions:**

- Please describe how well the monitoring and evaluation process in each of the previous local mitigation plans was followed. Were any changes identified that were incorporated into the plan update maintenance section?

*For additional information, see "Element A – Planning Process" in the Local Mitigation Plan Review Guide, October, 2011, Page 15.*

#### **NCEM 2<sup>nd</sup> Review:**

**A1:** Sub-element A1 identified in Section 2, Planning Process, see page references above.

**A1d:** Sub-element A1d above requires document how the **Town of Hertford** was involved in the planning process. If Perquimans County represented the town by proxy, this should be documented in Table 2.1.

**A6:** FEMA requires a narrative describing how well the procedures established in the previously approved plan worked. Please revise Section 8 based on 1<sup>st</sup> review comments above.

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan</b> (section and/or page number)	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
<b>ELEMENT B. HAZARD IDENTIFICATION AND RISK ASSESSMENT</b>				
B1. Does the Plan include a description of the type, location, and extent of all natural hazards that can affect each jurisdiction(s)? (Requirement §201.6(c)(2)(i))	Sec 3 Sec 4			
B2. Does the Plan include information on previous occurrences of hazard events and on the probability of future hazard events for each jurisdiction? (Requirement §201.6(c)(2)(i))	Sec 3, Sec 4, Appendix E			
B3. Is there a description of each identified hazard’s impact on the community as well as an overall summary of the community’s vulnerability for each jurisdiction? (Requirement §201.6(c)(2)(ii))	Sec 4, Sec 5			
B4. Does the Plan address NFIP insured structures within the jurisdiction that have been repetitively damaged by floods? (Requirement §201.6(c)(2)(ii))	Sec 5, pages5-15			

# 1. REGULATION CHECKLIST

Regulation (44 CFR 201.6 Local Mitigation Plans)

Location in Plan  
(section and/or  
page number)

Met

Not  
Met

## ELEMENT B: REQUIRED REVISIONS

### NCEM Review:

**B1:** "The hazard description, or profile, must include information on location, extent, previous occurrences, and future probability for each hazard.

### Required Revisions:

- Nor'easter extent-Must describe which storm in the narrative has the highest storm class based on the Dolan-Davis measurement from the scale. **Added on page 16.**
- Flood extent-Must describe the highest recorded flood depth available in the area(s). **Added on page 19.**
- Thunderstorm extent-Must describe the highest recorded thunderstorm event listed in Appendix E; use the wind speed as the extent indicator. **Added on page 24.**
- Wildfire extent- Must describe the highest recorded number of acres burned for an event in the area. If NC Forest Service reports no historical wildfire events in the area then that should be stated in the narrative. **Added on page 25.**
- Rip Current extent-Must describe the highest recorded number of warnings in a historical year. Table 4.10 identifies 2004 with 3 warnings issued. **Added on page 36.**

**B2a:** "The plan must include the history of previous hazard events for each of the identified hazards."

**B2c:** "Plan updates must include hazard events that have occurred since the last plan was developed."

### Required Revisions:

- Must add history of previous wildfire events. If NC Forest Service reports no historical wildfire events in the area then that should be stated in the narrative. **Added on page 25.**

**B3b:** "Vulnerable assets and potential losses is more than a list of the total exposure of population, structures, and critical facilities in the planning area. An example of an overall summary is a list of "key issues" or problem statements that clearly describes the community's greatest vulnerabilities and that will be addressed in the mitigation strategy."

### Required Revisions:

- Vulnerability Assessment, Section 5, identifies "1,137 Repetitive Loss properties." Need to add narrative tying the vulnerability assessment to the mitigation strategy by describing how mitigation of RL properties are "key issues" for the communities impacted by flood risk. Also, consider narrative to describe how mitigation of critical facilities are key issues. "The overall summary should provide a list of key issues or problem statements that clearly describe(s) the community's greatest vulnerabilities and that will be addressed in the mitigation strategy."

*For additional information, see "Element B – Hazard Identification and Risk Assessment" in the Local Mitigation Plan Review Guide, October, 2011, Page 20.*

### NCEM 2<sup>nd</sup> Review:

**B1:** Sub-element B1 identified in Section 4, Hazard Identification, see page references above.

**B3:** FEMA requires a narrative tying the vulnerability assessment to the mitigation strategy. Please revise Section 5 based on 1<sup>st</sup> review comments above.

## ELEMENT C. MITIGATION STRATEGY

C1. Does the plan document each jurisdiction's existing authorities, policies, programs and resources and its ability to expand on and improve these existing policies and programs? (Requirement §201.6(c)(3))

Sec 6

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan</b> (section and/or page number)	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
C2. Does the Plan address each jurisdiction's participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement §201.6(c)(3)(ii))	Sec 6, <a href="#">pages 7-10</a>			
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))	Sec 7			
C4. Does the Plan identify and analyze a comprehensive range of specific mitigation actions and projects for each jurisdiction being considered to reduce the effects of hazards, with emphasis on new and existing buildings and infrastructure? (Requirement §201.6(c)(3)(ii))	Sec 7			
C5. Does the Plan contain an action plan that describes how the actions identified will be prioritized (including cost benefit review), implemented, and administered by each jurisdiction? (Requirement §201.6(c)(3)(iv)); (Requirement §201.6(c)(3)(iii))	Sec 7			
C6. Does the Plan describe a process by which local governments will integrate the requirements of the mitigation plan into other planning mechanisms, such as comprehensive or capital improvement plans, when appropriate? (Requirement §201.6(c)(4)(ii))	Sec 8.2			

# 1. REGULATION CHECKLIST

Regulation (44 CFR 201.6 Local Mitigation Plans)

Location in Plan  
(section and/or  
page number)

Met Not  
Met

## ELEMENT C: REQUIRED REVISIONS

### NCEM Review:

**C2:** The plan must describe each jurisdiction’s participation in the NFIP and describe their floodplain management program for continued compliance. Simply stating “The community will continue to comply with NFIP,” will not meet this requirement.

**C2:** “Jurisdictions that are currently not participating in the NFIP and where an FHBM or FIRM has been issued may meet this requirement by describing the reasons why the community does not participate.” (see C2; pg. 23 of the Local Mitigation Plan Review Guide).

### Required Revisions

- Community Capability Assessment must describe each jurisdiction’s floodplain management program for continued compliance or reference how this has been achieved using the 2014 Mitigation Strategies.

**C4:** See Cindy’s Attachment

**C5:** See Cindy’s Attachment

**C6c:** “A multi-jurisdictional plan must describe each participating jurisdiction’s individual process for integrating hazard mitigation actions applicable to their community into other planning mechanisms.”

**C6d:** “The updated plan must explain how the jurisdiction(s) incorporated the mitigation plan, when appropriate, into other planning mechanisms as a demonstration of progress in local hazard mitigation efforts.”

**C6e:** “The updated plan must continue to describe how the mitigation strategy, including the goals and hazard mitigation actions will be incorporated into other planning mechanisms.”

### Required Revisions:

- Add narrative to explain each participating jurisdiction’s individual process for integrating hazard mitigation actions.
- Add narrative to “explain how each jurisdiction(s) incorporated the mitigation plan, when appropriate, into other planning mechanisms” or reference additional area(s) in the plan where the information describes this progress. What has been accomplished during the last five year period?
- Narrative “must continue to describe how the mitigation strategy...will be incorporated into other planning mechanisms.” Describe process for the next five year period.

### NCEM 2nd Review:

**C2:** Identified in Section 6 on bottom of page 8.

**C4:** See Attachment

**C5:** See Attachment

**C6:** Narrative in Section 8.2 should meet checklist criteria.

For additional information, see “Element C. Mitigation Strategy” in the Local Mitigation Plan Review Guide, October, 2011, Page 25.

## ELEMENT D. PLAN REVIEW, EVALUATION, AND IMPLEMENTATION (applicable to plan updates only)

D1. Was the plan revised to reflect changes in development? (Requirement §201.6(d)(3))	Sec 5		
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))	Appendix F		
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))	Appendix F		



1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
<b>ELEMENT D: REQUIRED REVISIONS</b>				
<b>NCEM Review:</b>				
<b>D2:</b> See Cindy's Attachment				
<b>D3:</b> "The plan must describe if and how any priorities changed since the plan was previously approved."				
<b>Required Revisions:</b>				
<ul style="list-style-type: none"> <li>This element will be evaluated based upon the revised information received for Appendix F or Section 7, depending on where you decide to place the "update status" for existing (2010) actions.</li> </ul>				
<b>NCEM Review:</b>				
<b>D2:</b> See Attachment				
<b>ELEMENT E. PLAN ADOPTION</b>				
E1. Does the Plan include documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval? (Requirement §201.6(c)(5))	Sec 1.4, Appendix J			
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))	Sec 1.4, Appendix J			
<b>ELEMENT E: REQUIRED REVISIONS</b>				
<b>ELEMENT F. ADDITIONAL STATE REQUIREMENTS (OPTIONAL FOR STATE REVIEWERS ONLY; NOT TO BE COMPLETED BY FEMA)</b>				
F1.				
F2.				
<b>ELEMENT F: REQUIRED REVISIONS</b>				

## SECTION 2: PLAN ASSESSMENT

**INSTRUCTIONS:** The purpose of the Plan Assessment is to offer the local community more comprehensive feedback to the community on the quality and utility of the plan in a narrative format. The audience for the Plan Assessment is not only the plan developer/local community planner, but also elected officials, local departments and agencies, and others involved in implementing the Local Mitigation Plan. The Plan Assessment must be completed by FEMA. The Assessment is an opportunity for FEMA to provide feedback and information to the community on: 1) suggested improvements to the Plan; 2) specific sections in the Plan where the community has gone above and beyond minimum requirements; 3) recommendations for plan implementation; and 4) ongoing partnership(s) and information on other FEMA programs, specifically RiskMAP and Hazard Mitigation Assistance programs. The Plan Assessment is divided into two sections:

1. Plan Strengths and Opportunities for Improvement
2. Resources for Implementing Your Approved Plan

***Plan Strengths and Opportunities for Improvement*** is organized according to the plan Elements listed in the Regulation Checklist. Each Element includes a series of italicized bulleted items that are suggested topics for consideration while evaluating plans, but it is not intended to be a comprehensive list. FEMA Mitigation Planners are not required to answer each bullet item, and should use them as a guide to paraphrase their own written assessment (2-3 sentences) of each Element.

The Plan Assessment must not reiterate the required revisions from the Regulation Checklist or be regulatory in nature, and should be open-ended and to provide the community with suggestions for improvements or recommended revisions. The recommended revisions are suggestions for improvement and are not required to be made for the Plan to meet Federal regulatory requirements. The italicized text should be deleted once FEMA has added comments regarding strengths of the plan and potential improvements for future plan revisions. It is recommended that the Plan Assessment be a short synopsis of the overall strengths and weaknesses of the Plan (no longer than two pages), rather than a complete recap section by section.

***Resources for Implementing Your Approved Plan*** provides a place for FEMA to offer information, data sources and general suggestions on the overall plan implementation and maintenance process. Information on other possible sources of assistance including, but not limited to, existing publications, grant funding or training opportunities, can be provided. States may add state and local resources, if available.

## **A. Plan Strengths and Opportunities for Improvement**

This section provides a discussion of the strengths of the plan document and identifies areas where these could be improved beyond minimum requirements.

### **Element A: Planning Process**

*How does the Plan go above and beyond minimum requirements to document the planning process with respect to:*

- *Involvement of stakeholders (elected officials/decision makers, plan implementers, business owners, academic institutions, utility companies, water/sanitation districts, etc.);*
- *Involvement of Planning, Emergency Management, Public Works Departments or other planning agencies (i.e., regional planning councils);*
- *Diverse methods of participation (meetings, surveys, online, etc.); and*
- *Reflective of an open and inclusive public involvement process.*

### **Element B: Hazard Identification and Risk Assessment**

*In addition to the requirements listed in the Regulation Checklist, 44 CFR 201.6 Local Mitigation Plans identifies additional elements that should be included as part of a plan's risk assessment. The plan should describe vulnerability in terms of:*

- 1) *A general description of land uses and future development trends within the community so that mitigation options can be considered in future land use decisions;*
- 2) *The types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard areas; and*
- 3) *A description of potential dollar losses to vulnerable structures, and a description of the methodology used to prepare the estimate.*

*How does the Plan go above and beyond minimum requirements to document the Hazard Identification and Risk Assessment with respect to:*

- *Use of best available data (flood maps, HAZUS, flood studies) to describe significant hazards;*
- *Communication of risk on people, property, and infrastructure to the public (through tables, charts, maps, photos, etc.);*
- *Incorporation of techniques and methodologies to estimate dollar losses to vulnerable structures;*
- *Incorporation of Risk MAP products (i.e., depth grids, Flood Risk Report, Changes Since Last FIRM, Areas of Mitigation Interest, etc.); and*
- *Identification of any data gaps that can be filled as new data became available.*

### **Element C: Mitigation Strategy**

*How does the Plan go above and beyond minimum requirements to document the Mitigation Strategy with respect to:*

- *Key problems identified in, and linkages to, the vulnerability assessment;*
- *Serving as a blueprint for reducing potential losses identified in the Hazard Identification and Risk Assessment;*
- *Plan content flow from the risk assessment (problem identification) to goal setting to mitigation action development;*
- *An understanding of mitigation principles (diversity of actions that include structural projects, preventative measures, outreach activities, property protection measures, post-disaster actions, etc);*
- *Specific mitigation actions for each participating jurisdictions that reflects their unique risks and capabilities;*
- *Integration of mitigation actions with existing local authorities, policies, programs, and resources; and*
- *Discussion of existing programs (including the NFIP), plans, and policies that could be used to implement mitigation, as well as document past projects.*

### **Element D: Plan Update, Evaluation, and Implementation (Plan Updates Only)**

*How does the Plan go above and beyond minimum requirements to document the 5-year Evaluation and Implementation measures with respect to:*

- *Status of previously recommended mitigation actions;*
- *Identification of barriers or obstacles to successful implementation or completion of mitigation actions, along with possible solutions for overcoming risk;*
- *Documentation of annual reviews and committee involvement;*
- *Identification of a lead person to take ownership of, and champion the Plan;*
- *Reducing risks from natural hazards and serving as a guide for decisions makers as they commit resources to reducing the effects of natural hazards;*
- *An approach to evaluating future conditions (i.e. socio-economic, environmental, demographic, change in built environment etc.);*
- *Discussion of how changing conditions and opportunities could impact community resilience in the long term; and*
- *Discussion of how the mitigation goals and actions support the long-term community vision for increased resilience.*

## B. Resources for Implementing Your Approved Plan

*Ideas may be offered on moving the mitigation plan forward and continuing the relationship with key mitigation stakeholders such as the following:*

- *What FEMA assistance (funding) programs are available (for example, Hazard Mitigation Assistance (HMA)) to the jurisdiction(s) to assist with implementing the mitigation actions?*
- *What other Federal programs (National Flood Insurance Program (NFIP), Community Rating System (CRS), Risk MAP, etc.) may provide assistance for mitigation activities?*
- *What publications, technical guidance or other resources are available to the jurisdiction(s) relevant to the identified mitigation actions?*
- *Are there upcoming trainings/workshops (Benefit-Cost Analysis (BCA), HMA, etc.) to assist the jurisdictions(s)?*
- *What mitigation actions can be funded by other Federal agencies (for example, U.S. Forest Service, National Oceanic and Atmospheric Administration (NOAA), Environmental Protection Agency (EPA) Smart Growth, Housing and Urban Development (HUD) Sustainable Communities, etc.) and/or state and local agencies?*

**SECTION 3:  
MULTI-JURISDICTION SUMMARY SHEET (OPTIONAL)**

**INSTRUCTIONS:** For multi-jurisdictional plans, a Multi-jurisdiction Summary Spreadsheet may be completed by listing each participating jurisdiction, which required Elements for each jurisdiction were ‘Met’ or ‘Not Met,’ and when the adoption resolutions were received. This Summary Sheet does not imply that a mini-plan be developed for each jurisdiction; it should be used as an optional worksheet to ensure that each jurisdiction participating in the Plan has been documented and has met the requirements for those Elements (A through E).

MULTI-JURISDICTION SUMMARY SHEET												
#	Jurisdiction Name	Jurisdiction Type (city/borough/ township/ village, etc.)	Plan POC	Mailing Address	Email	Phone	Requirements Met (Y/N)				F. State Requirements	
							A. Planning Process	B. Hazard Identification & Risk Assessment	C. Mitigation Strategy	D. Plan Review, Evaluation & Implementation		E. Plan Adoption
1	Camden	County										
2	Chowan	County										
3	Edenton	Town										
4	Currituck	County										
5	Dare	County										
6	Duck	Town										
7	Kill Devil Hills	Town										
8	Kitty Hawk	Town										
9	Manteo	Town										

**MULTI-JURISDICTION SUMMARY SHEET**

#	Jurisdiction Name	Jurisdiction Type (city/borough/township/village, etc.)	Plan POC	Mailing Address	Email	Phone	Requirements Met (Y/N)								
							A. Planning Process	B. Hazard Identification & Risk Assessment	C. Mitigation Strategy	D. Plan Review, Evaluation & Implementation	E. Plan Adoption	F. State Requirements			
10	Nags Head	Town													
11	Southern Shores	Town													
12	Gates	County													
13	Gatesville	Town													
14	Hertford	County													
15	Ahoskie	Town													
16	Coffield	Town													
17	Como	Town													
18	Harrellsville	Town													
19	Murfreesboro	Town													
20	Winton	Town													
21	Pasquotank	County													
22	Elizabeth City	City													
23	Perquimans	County													

**MULTI-JURISDICTION SUMMARY SHEET**

#	Jurisdiction Name	Jurisdiction Type (city/borough/ township/ village, etc.)	Plan POC	Mailing Address	Email	Phone	Requirements Met (Y/N)							
							A. Planning Process	B. Hazard Identification & Risk Assessment	C. Mitigation Strategy	D. Plan Review, Evaluation & Implementation	E. Plan Adoption	F. State Requirements		
24	Hertford	Town												
25	Winfall	City												





**C4. Does the Plan identify and analyze a comprehensive range of specific mitigation actions and projects for each jurisdiction being considered to reduce the effects of hazards, with emphasis on new and existing buildings and infrastructure? 44 CFR 201.6(c)(3)(ii) and 44 CFR 201.6(c)(3)(iv) 2013 1001 Local Plan Review Guide. FEMA \*\*\*** The mitigation plan may include non-mitigation actions, such as actions that are emergency response or operational preparedness in nature. These will not be accepted as hazard mitigation actions, but neither will FEMA require these to be removed from the plan prior to approval.

The Reader of this plan should never have to assume. The plan has to be clear on whether this is a **new** or an **existing** mitigation strategy. If the existing 2010-2012 mitigation strategies are being reworded or combined into a single 2015 strategy, it has to be cross referenced in Table 7 which strategies from the 2010-2012 existing plan has been **Revised or Combined**. Example: 2010 Strategy 6 is revised to include..., or 2010 Strategies 6 and 7 have been combined to create this strategy. If it is a significant change then add the existing 2010-2012 action to Table 7 and identify in the "Status Update" column that this action is deleted and why (Remember deleted and completed actions remain in the plan for one planning cycle). Add the Then state new action.

**Table 7.2.1 is missing the following Strategies from the 2010-2012 Plans:**

**Camden County** from 2010 Plan pages **75-91**:

Hurricane/wind

*Goal 1*

Obj. 1/Mit. Meas. 1 and 2;

Obj. 2/Mit. Meas 1 and 2;

Obj.3/ Mit. Meas. 1;

Obj. 4/ Mit. Meas. 1;

Obj. 5/ Mit. Meas 1;

Obj. 6/ Mit. Meas.2;

Flood

*Goal 1*

Obj. 1/Mit. Meas. 1 and 2;

*Goal 3*

Obj. 1/Mit. Meas. 1 and 3;

Obj. 2/Mit. Meas 1 and 2;

Obj.3/ Mit. Meas. 1

Tornado

*Goal 1*

Obj. 1/Mit. Meas. 1 and 2;

Obj. 2/Mit. Meas 2 and 3;

Obj.3/ Mit. Meas. 1;

Obj. 4/ Mit. Meas. 1

Winter Storm

*Goal 1*

Obj. 1/Mit. Meas. 1 and 2

Thunderstorm

Obj. 2/Mit. Meas 1 and 2;

Obj.3/ Mit. Meas. 1 and 2;

Obj. 4/ Mit. Meas. 2 and 3;

Obj 5/ Mit. Meas. 1;

Obj 6/ Mit. Meas. 1

Wildfire

Obj. 1/Mit. Meas. 1;

Obj. 2/Mit. Meas 1;

Obj.3/ Mit. Meas. 1 and 2

Missing Strategies from Camden County 2010 Plan pages and **96-100**:

Mitigation Measure Table

Measure numbers: 1,2,3,5,6,7,8,9,10,11,12,14,16,17,18,19,20,21,22,23,24,25

**Chowan County**\_2010 Plan, Tables 7-15, pages 62-73:

Table 7

1.1, 2.1,

Table 8

1.1, 3.1, 3.2, 4.1, 4.2, 4.3, 5.3, 7.1

Table 9

1.1, 1.2, 2.1, 2.2, 3.1

Table 10

1.1, 1.2, 2.1, 2.2, 3.1

Table 11

1.3, 1.4

Table 12

1.3, 2.1, 2.2

Table 13

1.1, 1.2

Table 14

1.1

Table 15

1.1, 1.2

**Town of Edenton**

Table 7

1.1, 1.2, 2.1, 2.2, 3.1

Table 8

1.1, 1.2, 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, 5.1, 5.2, 5.3, 6.1, 7.1, 8.1, 8.2, 8.3

Table 9

1.1, 1.2, 2.1, 2.2, 3.1

Table 10

1.1, 1.2, 2.1, 3.1

Table 11

1.1, 1.3, 1.4

Table 12

1.2, 1.3, 2.1, 2.2

Table 13

1.1, 1.2

Table 14

1.1

Table 15

1.1, 2.2

**Currituck County** 2009 plan

Goal 1 b, d; Goal 3 a, b; Goal 4 a; Goal 6 a, b; Goal 8 a, b, c, f, g; Goal 9 a, d, e; Goal 10 a, d; Goal 11 c, d;

**Dare County** 2010 plan

1c, 2b, 2c, 3b, 3d, 8d, 8e, 9a, 9b, 9c, 9d,

**Gates County** 2011 plan, pages 9:2 thru 9:8

Actions 4, 7, 8, 11, 12

**Hertford County** 2011 plan, pages 7-12 and 7-15 thru 7-18

Actions 10, 18, 19, 20, 21, 22, 23, 24, 25, 26

**Pasquotank County** 2011 plan

Hurricane Mitigation Strategy

Goal 1, Objective 1, Action 1, 2

Goal 1, Objective 2, Action 1, 2, 3

Goal 1, Objective 3, Action 1

Goal 1, Objective 4, Action 1

Goal 1, Objective 5, Action 1

Goal 1, Objective 6, Action 1, 2

Flood Mitigation Strategy

Goal 1, Objective 1, Action 1

Goal 2, Objective 1, Action 1, 2

Goal 3, Objective 1, Action 1, 2, 3

Goal 3, Objective 2, Action 1, 2

Goal 4, Objective 1, Action 1

Goal 4, Objective 2, Action 1

Tornado Mitigation Strategy

Goal 1, Objective 1, Action 1, 2

Goal 1, Objective 2, Action 1, 2, 3

Goal 1, Objective 3, Action 1

Goal 1, Objective 4, Action 1, 2

Thunderstorm Mitigation Strategy

Goal 1, Objective 1, Action 1

Goal 1, Objective 2, Action 1, 2

Goal 1, Objective 3, Action 1, 2

Goal 1, Objective 4, Action 1, 2, 3

Goal 1, Objective 5, Action 1

Goal 1, Objective 6, Action 1

Groundwater Contamination is considered a non-mitigation action (man-made such as actions that are emergency response or operational preparedness in nature. These will not be accepted as hazard mitigation actions, but neither will FEMA require these to be removed from the plan prior to approval. hazard in the mitigation plan and is not.

**Town of Duck** 2010 Plan

7b, 10a, 10c, 14a, 15b, 16a-c, 17a, 7b, 18a, 18b

**Town of Kill Devil Hills** 2010 Plan

All strategies from 2010 plan seem to be included in 2015.

**Town of Kitty Hawk** 2010 plan

All strategies from 2010 plan seem to be included in 2015.

**Khk7 Not found in 2010 Plan typo KHK13 missing 1<sup>st</sup> 3 words.**

**Town of Nags Head** 2010 Plan - Please see Attached File for number referencing the Strategies.

4,5,6,7,8,10,12,17,18,20,25,29,31,32,34,35,39,41,43,44,46,47,50,52,53,54,55,56,59,62,66,67,68,69,70

**Town of Manteo 2010 Plan**

Pg 223 J,O,P

**Town of Southern Shore 2010 Plan**

Pg. 6 Action: Provide property owners and developers with information regarding the construction of FEMA “Safe Rooms” from the effects of tornadoes and severe Storm. Pg 8 Action: Develop guidelines for reconstruction efforts.

**Town of Winfall 2010 Plan**

P-3,ES-3,

**The following 2015 Actions are not found in the Previous 2010-2012 Plans so they should be “New Strategies” unless they were *combined or revised* from previous strategies. Identify action(s) as “new action” or identify which 2010-2012 existing strategy(s) were continued in the 2015 plan by referencing the existing number.**

**Camden County - CAM 1-3, 5-16, 19-21**

**Chowan County – CHO 7, 12, 14**

**Town of Edenton – EDN 1, 2, 4, 6, 7, 9**

**Currituck County – CUR 4, 7, 12, 14, 16, 21, 28, 42**

**Dare County – DAR 27**

**Town of Duck – DCK 23, 26**

**Town of Kitty Hawk – KDH 22, 33-36**

**Town of Kill Devil Hills – KHK 7**

**Town of Nags Head – NGH 1, 2, 6, 8, 11, 17, 18, 19, 26, 41, 45, 46, 52-24,**

**Town of Manteo – MAN 9**

**Town of Southern Shore, Windfall, Hertford, and Perquimans County – OK no changes needed.**

**Element D-2: a.** The plan **must** describe the status of hazard mitigation actions in the previous plan by identifying those that have been completed or not completed. For actions that have not been completed, the plan **must** either describe whether the action is no longer relevant or be included as part of the updated action plan. *Intent: To evaluate and demonstrate progress made in the past five years in achieving goals and implementing actions outlined in their mitigation strategy. 2013 1001 Local Plan Review Guide. FEMA*

In the progress column, each community must describe what progress they have made for each and every action/strategy identified in the previous plan. An example of how you accomplish these needs to be included. If your community could not accomplish an action/strategy, just state why and if you will be deleting that action/strategy or if you will be attempt to accomplish it this upcoming cycle. Please give a target completion date.

Highlights: I noticed “incomplete” in the Implementation Status column of several plans. Please give details as to why it is incomplete.

I am unable to determine Progress at this time due to missing Strategies/Action or Implementation Statement from table 7.2.1. for the following Jurisdictions:

**Camden County**

**Chowan County**

**Town of Edenton**

**Currituck County**

**Dare County**

**Town of Duck**

**Town of Kill Devil Hills**

**Town of Nags Head**

**Town of Manteo**

**Town of Southern Shore**

**Gates County**

**Town of Gatesville**

**Hertford County**

**Town of Ahoskie**

**Town of Cofield**

**Town of Como**

**Town of Harrellsville**

**Town of Murfreesboro**

**Town of Winton**

**Pasquotank County**

**Elizabeth City**

**Town of Winfall**

**Town of Kill Devil Hills 2010 Plan**

All strategies from 2010 plan seem to be included in 2015. Update can be done.

**Town of Kitty Hawk 2010 plan**

All strategies from 2010 plan seem to be included in 2015.

**Khk7 Not found in 2010 Plan, KHK13 typo missing the first 3 words.**

**Perquimans County and the Town of Hertford** – All strategies from 2010 plan seem to be included in 2015.

## APPENDIX A: LOCAL MITIGATION PLAN REVIEW TOOL

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The *Local Mitigation Plan Review Tool* demonstrates how the Local Mitigation Plan meets the regulation in 44 CFR §201.6 and offers States and FEMA Mitigation Planners an opportunity to provide feedback to the community.

- The Regulation Checklist provides a summary of FEMA’s evaluation of whether the Plan has addressed all requirements.
- The Plan Assessment identifies the plan’s strengths as well as documents areas for future improvement.
- The Multi-jurisdiction Summary Sheet is an optional worksheet that can be used to document how each jurisdiction met the requirements of the each Element of the Plan (Planning Process; Hazard Identification and Risk Assessment; Mitigation Strategy; Plan Review, Evaluation, and Implementation; and Plan Adoption).

The FEMA Mitigation Planner must reference this *Local Mitigation Plan Review Guide* when completing the *Local Mitigation Plan Review Tool*.

<b>Jurisdiction:</b> Camden, Chowan, Currituck, Dare, Gates, Hertford, Pasquotank and Perquimans Counties	<b>Title of Plan:</b> Albemarle Regional Hazard Mitigation Plan	<b>Date of Plan:</b> 3/09/2015
<b>Local Point of Contact:</b> Billy Winn	<b>Address:</b> PO Box 536 Gatesville, NC 27938	<b>E-Mail:</b> <a href="mailto:bwinn@gatescountync.gov">bwinn@gatescountync.gov</a>
<b>Title:</b> Emergency Management Director		
<b>Agency:</b> Gates County		
<b>Phone Number:</b> 252-357-5569		

<b>State Reviewer:</b> <a href="#">John Mello</a>	<b>Title:</b> <a href="#">Hazard Mitigation Planner</a>	<b>Date:</b> <a href="#">3/9/2015</a>
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<b>FEMA Reviewer:</b>	<b>Title:</b>	<b>Date:</b>
<b>Date Received in FEMA Region</b> <i>(insert #)</i>		
<b>Plan Not Approved</b>		
<b>Plan Approvable Pending Adoption</b>		
<b>Plan Approved</b>		

**SECTION 1:  
REGULATION CHECKLIST**

**INSTRUCTIONS:** The Regulation Checklist must be completed by FEMA. The purpose of the Checklist is to identify the location of relevant or applicable content in the Plan by Element/sub-element and to determine if each requirement has been ‘Met’ or ‘Not Met.’ The ‘Required Revisions’ summary at the bottom of each Element must be completed by FEMA to provide a clear explanation of the revisions that are required for plan approval. Required revisions must be explained for each plan sub-element that is ‘Not Met.’ Sub-elements should be referenced in each summary by using the appropriate numbers (A1, B3, etc.), where applicable. Requirements for each Element and sub-element are described in detail in this *Plan Review Guide* in Section 4, Regulation Checklist.

1. REGULATION CHECKLIST	Location in Plan	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)	(section and/or page number)		
<b>ELEMENT A. PLANNING PROCESS</b>			
A1. Does the Plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction? (Requirement §201.6(c)(1))	Sec 2.2		
A2. Does the Plan document an opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, agencies that have the authority to regulate development as well as other interests to be involved in the planning process? (Requirement §201.6(b)(2))	Sec 2.6		
A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))	Sec 2.5		
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))	Sec 6		
A5. Is there discussion of how the community(ies) will continue public participation in the plan maintenance process? (Requirement §201.6(c)(4)(iii))	Sec 8		
A6. Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a 5-year cycle)? (Requirement §201.6(c)(4)(i))	Sec 8		



# 1. REGULATION CHECKLIST

Regulation (44 CFR 201.6 Local Mitigation Plans)

Location in Plan  
(section and/or  
page number)

Met Not  
Met Met

## ELEMENT A: REQUIRED REVISIONS

### NCEM Review:

**A1b:** "The plan must list the jurisdiction(s) participating in the plan that seek approval."

**A1c:** "The Plan must provide, at a minimum, the jurisdiction represented and the person's position or title and agency within the jurisdiction."

**A1d:** "For each jurisdiction seeking plan approval, the plan must document how they were involved in the planning process. For example, the plan may document meetings attended, data provided, or stakeholder and public involvement activities offered. Jurisdictions that adopt the plan without documenting how they participated in the planning process will not be approved."

### Required Revisions:

- First paragraph of 2.2 in addition to the County names, should also list the names of the 17 local participating jurisdictions.
- Table 2.1 lists the jurisdiction represented and the agency within the jurisdiction. The table must also include the person's position or title.
- The plan must document how the following jurisdictions were involved in the planning process: Town Of Gatesville, Town Of Cofield, Town of Como, City of Harrellsville, Town of Murfreesboro, and Elizabeth City. These jurisdictions do not appear to have representation in Table 2.1.
- Please document how each jurisdiction (all 25) was involved in the planning process. This can be achieved by documenting meetings attended or a narrative statement describing participation activities. Examples for Appendix B are attendance rosters, meeting agendas, meeting minutes if recorded.

**A4a:** "The plan must document what existing plans, studies, reports, and technical information were reviewed.

**A4b:** "The plan must document how relevant information was incorporated into the mitigation plan."

### Required Revisions:

- The plan does document what existing plans, studies, reports, and technical information were reviewed and provides a description of each and what communities have each capability. However, Section 6 does not describe if or how relevant information from those existing capabilities was incorporated into the plan. Please describe the A4b requirement or identify where in the plan this information is located.

**A6:** "Plan updates provide the opportunity to consider how well the procedures established in the previously approved plan worked and revise them as needed." *"Task 7" in the Local Mitigation Planning Handbook, March 2013, Page 7-1.*

### Required Revisions:

- Please describe how well the monitoring and evaluation process in each of the previous local mitigation plans was followed. Were any changes identified that were incorporated into the plan update maintenance section?

*For additional information, see "Element A – Planning Process" in the Local Mitigation Plan Review Guide, October, 2011, Page 15.*

## ELEMENT B. HAZARD IDENTIFICATION AND RISK ASSESSMENT

B1. Does the Plan include a description of the type, location, and extent of all natural hazards that can affect each jurisdiction(s)? (Requirement §201.6(c)(2)(i))	Sec 3 Sec 4		
B2. Does the Plan include information on previous occurrences of hazard events and on the probability of future hazard events for each jurisdiction? (Requirement §201.6(c)(2)(i))	Sec 3, Sec 4, Appendix E		

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan</b> (section and/or page number)	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
B3. Is there a description of each identified hazard's impact on the community as well as an overall summary of the community's vulnerability for each jurisdiction? (Requirement §201.6(c)(2)(ii))	Sec 4, Sec 5			
B4. Does the Plan address NFIP insured structures within the jurisdiction that have been repetitively damaged by floods? (Requirement §201.6(c)(2)(ii))	Sec 5, pages5-15			
<b>ELEMENT B: REQUIRED REVISIONS</b>				
<b>NCEM Review:</b>				
<b>B1:</b> "The hazard description, or profile, must include information on location, extent, previous occurrences, and future probability for each hazard."				
<b>Required Revisions:</b>				
<ul style="list-style-type: none"> <li>Nor'easter extent-Must describe which storm in the narrative has the highest storm class based on the Dolan-Davis measurement from the scale.</li> <li>Flood extent-Must describe the highest recorded flood depth available in the area(s).</li> <li>Thunderstorm extent-Must describe the highest recorded thunderstorm event listed in Appendix E; use the wind speed as the extent indicator.</li> <li>Wildfire extent- Must describe the highest recorded number of acres burned for an event in the area. If NC Forest Service reports no historical wildfire events in the area then that should be stated in the narrative.</li> <li>Rip Current extent-Must describe the highest recorded number of warnings in a historical year. Table 4.10 identifies 2004 with 3 warnings issued.</li> </ul>				
<b>B2a:</b> "The plan must include the history of previous hazard events for each of the identified hazards."				
<b>B2c:</b> "Plan updates must include hazard events that have occurred since the last plan was developed."				
<b>Required Revisions:</b>				
<ul style="list-style-type: none"> <li>Must add history of previous wildfire events. If NC Forest Service reports no historical wildfire events in the area then that should be stated in the narrative.</li> </ul>				
<b>B3b:</b> "Vulnerable assets and potential losses is more than a list of the total exposure of population, structures, and critical facilities in the planning area. An example of an overall summary is a list of "key issues" or problem statements that clearly describes the community's greatest vulnerabilities and that will be addressed in the mitigation strategy."				
<b>Required Revisions:</b>				
<ul style="list-style-type: none"> <li>Vulnerability Assessment, Section 5, identifies "1,137 Repetitive Loss properties." Need to add narrative tying the vulnerability assessment to the mitigation strategy by describing how mitigation of RL properties are "key issues" for the communities impacted by flood risk. Also, consider narrative to describe how mitigation of critical facilities are key issues. "The overall summary should provide a list of key issues or problem statements that clearly describe(s) the community's greatest vulnerabilities and that will be addressed in the mitigation strategy."</li> </ul>				
<i>For additional information, see "Element B – Hazard Identification and Risk Assessment" in the Local Mitigation Plan Review Guide, October, 2011, Page 20.</i>				
<b>ELEMENT C. MITIGATION STRATEGY</b>				
C1. Does the plan document each jurisdiction's existing authorities, policies, programs and resources and its ability to expand on and improve these existing policies and programs? (Requirement §201.6(c)(3))	Sec 6			

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan</b> (section and/or page number)	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
C2. Does the Plan address each jurisdiction's participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement §201.6(c)(3)(ii))	Sec 6			
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))	Sec 7			
C4. Does the Plan identify and analyze a comprehensive range of specific mitigation actions and projects for each jurisdiction being considered to reduce the effects of hazards, with emphasis on new and existing buildings and infrastructure? (Requirement §201.6(c)(3)(ii))	Sec 7			
C5. Does the Plan contain an action plan that describes how the actions identified will be prioritized (including cost benefit review), implemented, and administered by each jurisdiction? (Requirement §201.6(c)(3)(iv)); (Requirement §201.6(c)(3)(iii))	Sec 7			
C6. Does the Plan describe a process by which local governments will integrate the requirements of the mitigation plan into other planning mechanisms, such as comprehensive or capital improvement plans, when appropriate? (Requirement §201.6(c)(4)(ii))	Sec 8.2			

# 1. REGULATION CHECKLIST

Regulation (44 CFR 201.6 Local Mitigation Plans)

Location in Plan  
(section and/or  
page number)

Met Not  
Met Met

## ELEMENT C: REQUIRED REVISIONS

### NCEM Review:

**C2:** The plan must describe each jurisdiction’s participation in the NFIP and describe their floodplain management program for continued compliance. Simply stating “The community will continue to comply with NFIP,” will not meet this requirement.

**C2:** “Jurisdictions that are currently not participating in the NFIP and where an FHBM or FIRM has been issued may meet this requirement by describing the reasons why the community does not participate.” (see C2; pg. 23 of the Local Mitigation Plan Review Guide).

### Required Revisions

- Community Capability Assessment must describe each jurisdiction’s floodplain management program for continued compliance or reference how this has been achieved using the 2014 Mitigation Strategies.

**C4:** See Cindy’s Attachment

**C5:** See Cindy’s Attachment

**C6c:** “A multi-jurisdictional plan must describe each participating jurisdiction’s individual process for integrating hazard mitigation actions applicable to their community into other planning mechanisms.”

**C6d:** “The updated plan must explain how the jurisdiction(s) incorporated the mitigation plan, when appropriate, into other planning mechanisms as a demonstration of progress in local hazard mitigation efforts.”

**C6e:** “The updated plan must continue to describe how the mitigation strategy, including the goals and hazard mitigation actions will be incorporated into other planning mechanisms.”

### Required Revisions:

- Add narrative to explain each participating jurisdiction’s individual process for integrating hazard mitigation actions.
- Add narrative to “explain how each jurisdiction(s) incorporated the mitigation plan, when appropriate, into other planning mechanisms” or reference additional area(s) in the plan where the information describes this progress. What has been accomplished during the last five year period?
- Narrative “must continue to describe how the mitigation strategy...will be incorporated into other planning mechanisms.” Describe process for the next five year period.

*For additional information, see “Element C. Mitigation Strategy” in the Local Mitigation Plan Review Guide, October, 2011, Page 25.*

## ELEMENT D. PLAN REVIEW, EVALUATION, AND IMPLEMENTATION (applicable to plan updates only)

D1. Was the plan revised to reflect changes in development? (Requirement §201.6(d)(3))	Sec 5		
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))	Appendix F		
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))	Appendix F		

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan</b> (section and/or page number)	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
<b><u>ELEMENT D: REQUIRED REVISIONS</u></b>				
<b>NCEM Review:</b>				
<b>D2:</b> See Cindy's Attachment				
<b>D3:</b> "The plan must describe if and how any priorities changed since the plan was previously approved."				
<b>Required Revisions:</b>				
<ul style="list-style-type: none"> <li>This element will be evaluated based upon the revised information received for Appendix F or Section 7, depending on where you decide to place the "update status" for existing (2010) actions.</li> </ul>				
<b>ELEMENT E. PLAN ADOPTION</b>				
E1. Does the Plan include documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval? (Requirement §201.6(c)(5))	Sec 1.4, Appendix J			
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))	Sec 1.4, Appendix J			
<b><u>ELEMENT E: REQUIRED REVISIONS</u></b>				
<b>ELEMENT F. ADDITIONAL STATE REQUIREMENTS (OPTIONAL FOR STATE REVIEWERS ONLY; NOT TO BE COMPLETED BY FEMA)</b>				
F1.				
F2.				
<b><u>ELEMENT F: REQUIRED REVISIONS</u></b>				

## SECTION 2: PLAN ASSESSMENT

**INSTRUCTIONS:** The purpose of the Plan Assessment is to offer the local community more comprehensive feedback to the community on the quality and utility of the plan in a narrative format. The audience for the Plan Assessment is not only the plan developer/local community planner, but also elected officials, local departments and agencies, and others involved in implementing the Local Mitigation Plan. The Plan Assessment must be completed by FEMA. The Assessment is an opportunity for FEMA to provide feedback and information to the community on: 1) suggested improvements to the Plan; 2) specific sections in the Plan where the community has gone above and beyond minimum requirements; 3) recommendations for plan implementation; and 4) ongoing partnership(s) and information on other FEMA programs, specifically RiskMAP and Hazard Mitigation Assistance programs. The Plan Assessment is divided into two sections:

1. Plan Strengths and Opportunities for Improvement
2. Resources for Implementing Your Approved Plan

***Plan Strengths and Opportunities for Improvement*** is organized according to the plan Elements listed in the Regulation Checklist. Each Element includes a series of italicized bulleted items that are suggested topics for consideration while evaluating plans, but it is not intended to be a comprehensive list. FEMA Mitigation Planners are not required to answer each bullet item, and should use them as a guide to paraphrase their own written assessment (2-3 sentences) of each Element.

The Plan Assessment must not reiterate the required revisions from the Regulation Checklist or be regulatory in nature, and should be open-ended and to provide the community with suggestions for improvements or recommended revisions. The recommended revisions are suggestions for improvement and are not required to be made for the Plan to meet Federal regulatory requirements. The italicized text should be deleted once FEMA has added comments regarding strengths of the plan and potential improvements for future plan revisions. It is recommended that the Plan Assessment be a short synopsis of the overall strengths and weaknesses of the Plan (no longer than two pages), rather than a complete recap section by section.

***Resources for Implementing Your Approved Plan*** provides a place for FEMA to offer information, data sources and general suggestions on the overall plan implementation and maintenance process. Information on other possible sources of assistance including, but not limited to, existing publications, grant funding or training opportunities, can be provided. States may add state and local resources, if available.

## **A. Plan Strengths and Opportunities for Improvement**

This section provides a discussion of the strengths of the plan document and identifies areas where these could be improved beyond minimum requirements.

### **Element A: Planning Process**

*How does the Plan go above and beyond minimum requirements to document the planning process with respect to:*

- *Involvement of stakeholders (elected officials/decision makers, plan implementers, business owners, academic institutions, utility companies, water/sanitation districts, etc.);*
- *Involvement of Planning, Emergency Management, Public Works Departments or other planning agencies (i.e., regional planning councils);*
- *Diverse methods of participation (meetings, surveys, online, etc.); and*
- *Reflective of an open and inclusive public involvement process.*

### **Element B: Hazard Identification and Risk Assessment**

*In addition to the requirements listed in the Regulation Checklist, 44 CFR 201.6 Local Mitigation Plans identifies additional elements that should be included as part of a plan's risk assessment. The plan should describe vulnerability in terms of:*

- 1) *A general description of land uses and future development trends within the community so that mitigation options can be considered in future land use decisions;*
- 2) *The types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard areas; and*
- 3) *A description of potential dollar losses to vulnerable structures, and a description of the methodology used to prepare the estimate.*

*How does the Plan go above and beyond minimum requirements to document the Hazard Identification and Risk Assessment with respect to:*

- *Use of best available data (flood maps, HAZUS, flood studies) to describe significant hazards;*
- *Communication of risk on people, property, and infrastructure to the public (through tables, charts, maps, photos, etc.);*
- *Incorporation of techniques and methodologies to estimate dollar losses to vulnerable structures;*
- *Incorporation of Risk MAP products (i.e., depth grids, Flood Risk Report, Changes Since Last FIRM, Areas of Mitigation Interest, etc.); and*
- *Identification of any data gaps that can be filled as new data became available.*

### **Element C: Mitigation Strategy**

*How does the Plan go above and beyond minimum requirements to document the Mitigation Strategy with respect to:*

- *Key problems identified in, and linkages to, the vulnerability assessment;*
- *Serving as a blueprint for reducing potential losses identified in the Hazard Identification and Risk Assessment;*
- *Plan content flow from the risk assessment (problem identification) to goal setting to mitigation action development;*
- *An understanding of mitigation principles (diversity of actions that include structural projects, preventative measures, outreach activities, property protection measures, post-disaster actions, etc);*
- *Specific mitigation actions for each participating jurisdictions that reflects their unique risks and capabilities;*
- *Integration of mitigation actions with existing local authorities, policies, programs, and resources; and*
- *Discussion of existing programs (including the NFIP), plans, and policies that could be used to implement mitigation, as well as document past projects.*

### **Element D: Plan Update, Evaluation, and Implementation (Plan Updates Only)**

*How does the Plan go above and beyond minimum requirements to document the 5-year Evaluation and Implementation measures with respect to:*

- *Status of previously recommended mitigation actions;*
- *Identification of barriers or obstacles to successful implementation or completion of mitigation actions, along with possible solutions for overcoming risk;*
- *Documentation of annual reviews and committee involvement;*
- *Identification of a lead person to take ownership of, and champion the Plan;*
- *Reducing risks from natural hazards and serving as a guide for decisions makers as they commit resources to reducing the effects of natural hazards;*
- *An approach to evaluating future conditions (i.e. socio-economic, environmental, demographic, change in built environment etc.);*
- *Discussion of how changing conditions and opportunities could impact community resilience in the long term; and*
- *Discussion of how the mitigation goals and actions support the long-term community vision for increased resilience.*



## **B. Resources for Implementing Your Approved Plan**

*Ideas may be offered on moving the mitigation plan forward and continuing the relationship with key mitigation stakeholders such as the following:*

- *What FEMA assistance (funding) programs are available (for example, Hazard Mitigation Assistance (HMA)) to the jurisdiction(s) to assist with implementing the mitigation actions?*
- *What other Federal programs (National Flood Insurance Program (NFIP), Community Rating System (CRS), Risk MAP, etc.) may provide assistance for mitigation activities?*
- *What publications, technical guidance or other resources are available to the jurisdiction(s) relevant to the identified mitigation actions?*
- *Are there upcoming trainings/workshops (Benefit-Cost Analysis (BCA), HMA, etc.) to assist the jurisdictions(s)?*
- *What mitigation actions can be funded by other Federal agencies (for example, U.S. Forest Service, National Oceanic and Atmospheric Administration (NOAA), Environmental Protection Agency (EPA) Smart Growth, Housing and Urban Development (HUD) Sustainable Communities, etc.) and/or state and local agencies?*

**SECTION 3:  
MULTI-JURISDICTION SUMMARY SHEET (OPTIONAL)**

**INSTRUCTIONS:** For multi-jurisdictional plans, a Multi-jurisdiction Summary Spreadsheet may be completed by listing each participating jurisdiction, which required Elements for each jurisdiction were ‘Met’ or ‘Not Met,’ and when the adoption resolutions were received. This Summary Sheet does not imply that a mini-plan be developed for each jurisdiction; it should be used as an optional worksheet to ensure that each jurisdiction participating in the Plan has been documented and has met the requirements for those Elements (A through E).

MULTI-JURISDICTION SUMMARY SHEET											
#	Jurisdiction Name	Jurisdiction Type (city/borough/township/village, etc.)	Plan POC	Mailing Address	Email	Phone	Requirements Met (Y/N)				
							A. Planning Process	B. Hazard Identification & Risk Assessment	C. Mitigation Strategy	D. Plan Review, Evaluation & Implementation	E. Plan Adoption
1	Camden	County									
2	Chowan	County									
3	Edenton	Town									
4	Currituck	County									
5	Dare	County									
6	Duck	Town									
7	Kill Devil Hills	Town									
8	Kitty Hawk	Town									
9	Manteo	Town									

**MULTI-JURISDICTION SUMMARY SHEET**

#	Jurisdiction Name	Jurisdiction Type (city/borough/township/village, etc.)	Plan POC	Mailing Address	Email	Phone	Requirements Met (Y/N)								
							A. Planning Process	B. Hazard Identification & Risk Assessment	C. Mitigation Strategy	D. Plan Review, Evaluation & Implementation	E. Plan Adoption	F. State Requirements			
10	Nags Head	Town													
11	Southern Shores	Town													
12	Gates	County													
13	Gatesville	Town													
14	Hertford	County													
15	Ahoskie	Town													
16	Coffield	Town													
17	Como	Town													
18	Harrellsville	Town													
19	Murfreesboro	Town													
20	Winton	Town													
21	Pasquotank	County													
22	Elizabeth City	City													
23	Perquimans	County													

**MULTI-JURISDICTION SUMMARY SHEET**

#	Jurisdiction Name	Jurisdiction Type (city/borough/ township/ village, etc.)	Plan POC	Mailing Address	Email	Phone	Requirements Met (Y/N)						
							A. Planning Process	B. Hazard Identification & Risk Assessment	C. Mitigation Strategy	D. Plan Review, Evaluation & Implementation	E. Plan Adoption	F. State Requirements	
24	Hertford	Town											
25	Winfall	City											



**C4. Does the Plan identify and analyze a comprehensive range of specific mitigation actions and projects for each jurisdiction being considered to reduce the effects of hazards, with emphasis on new and existing buildings and infrastructure? 44 CFR 201.6(c)(3)(ii) and 44 CFR 201.6(c)(3)(iv) 2013 1001 Local Plan Review Guide. FEMA \*\*\*** The mitigation plan may include non-mitigation actions, such as actions that are emergency response or operational preparedness in nature. These will not be accepted as hazard mitigation actions, but neither will FEMA require these to be removed from the plan prior to approval.

**Required Revisions:**

**Nags Head** – Plan is missing 2 All Hazards Mitigation Strategies. NC44, 45, 53, and 54 cover all hazards for *response* not for Mitigation. These strategies are not required to be removed however they will not be counted for mitigation hazards.

Examples:

NGH53 (Annually updates emergency plans with mitigation strategies concerning critical facilities .....)  
NGH45(...mobile command center and critical facilities by adding backup generators or other equipment.)

**Camden County Table 6.2** - Plan is missing 2 All Hazards Mitigation Strategies. CAM 13, 15, 18, 20 can be used to cover all hazards. Hazards missing are Drought, Winter Storm, Earthquake, Landslide, Dam/Levee failure, Erosion, Wildfire, and Tsunami

**Gates County** and **Gatesville** Mitigation Strategies will need to be separated to show which strategies are for which jurisdiction as well as who will be responsible for carrying out the Strategies and funding Strategies. If the County is going to take ownership of that for Gatesville, then a statement to that effect needs to be included. The same is true for **Hertford County** and its communities.

**C4a.** The plan **must** include a mitigation strategy that 1) analyzes actions and/or projects that the jurisdiction considered to reduce the impacts of hazards identified in the risk assessment, and 2) identifies the actions and/or projects that the jurisdiction intends to implement.

**Suggested Revision:**

Please identify which goals the Mitigation Strategy Address. For example Camden county Mitigation Strategies CAM1 – Focused on Prevention, and Public Education and Goal 1, 2, and 6

**Required Revisions for Elements D-2 and C-5**

Each Hazard Mitigation Plan can use any format they choose. However the formatting must be consistent throughout the entire plan and page numbers should be included to help identify where material is located as well as where any revisions are needed. Please adjust the formatting on all of the Jurisdiction's Appendix F "Update on Hazard Mitigation Goals" and include page numbers.

In addition, the Appendix F "Update on Hazard Mitigation Goals" section typically can be used to satisfy Elements C-5 and D-2. Just in the first 5 pages of the Camden County Plan I found numerous revisions needed. The lack of page numbers and the inconsistent format, makes it is very difficult at best to cite all of the revisions needed. Even though I stopped the review of this section, as I leaf through other jurisdiction's sections, target completion dates, priority section, funding source, etc. are missing. It

appears the communities tried to give the consultant the updated information but due to the lack of consistent formatting, it is difficult to ensure all of the needed information was gathered.

Below is just a few of the examples of what is needed in most the jurisdictions, Appendix J “Update on Hazard Mitigation Goals” section.

**Element C5. Does the Plan contain an action plan that describes how the actions identified will be prioritized (including cost benefit review), implemented, and administered by each jurisdiction? 44 CFR 201.6(c)(3)(iii) and 44 CFR (c)(3)(iv).** c. The plan **must** identify the position, office, department, or agency responsible for implementing and administering the action (for each jurisdiction), and identify potential funding sources and expected timeframes for completion. *2013 1001 Local Plan Review Guide. FEMA*

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Other jurisdictions are missing target completion dates, priority list, funding sources, etc.

**This could be easily fix by adding a update/progress column in Section 7 Table 6. Table 6 already has the needed information except the update/progress information. See Element D-2 Below for the information needed for update/progress.**

**Element D-2: a.** The plan **must** describe the status of hazard mitigation actions in the previous plan by identifying those that have been completed or not completed. For actions that have not been completed, the plan **must** either describe whether the action is no longer relevant or be included as part of the updated action plan. *Intent: To evaluate and demonstrate progress made in the past five years in achieving goals and implementing actions outlined in their mitigation strategy. 2013 1001 Local Plan Review Guide. FEMA*

In the progress column, each community must describe what progress they have made for each and every action/strategy identified in the previous plan. An example of how you accomplish these needs to be included. If your community could not accomplish an action/strategy, just state why and if you will be deleting that action/strategy or if you will be attempt to accomplish it this upcoming cycle. Please give a target completion date.

**Missing updates** from Chowan County, The Town of Edenton, and Currituck County

**Winfall- 6.18** Table must include action P-3, and state that it is completed and must be removed next cycle.

**Gate County update** is missing. I believe it may have been named Gatesville by mistake. Please correct.

**Camden County-** Update on Hazard mitigation Goals- I am unable to reference page number because page numbers were not provided.

H-G101,05, Tor-G1-O1,03 What progress has been made? Example: How many citations have been enforced? How many structures were found in noncompliance? How many trees have been removed or trimmed?

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F-G2-O1, O2 if Objective states “completed”, then please state it will be removed next update. This action becomes a capability next update.

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F-G3-O2.1 please give some examples of the various sources.

***Some Key Points to remember.***

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**NEW**

For **Hertford County** and its 6 communities, there needs to be a statement made that all the communities have agreed that these mitigation strategies will be used in their communities, OR separate tables for each community can be used, OR another column can be added that indicates which community will use that strategy, OR any adjustment that clearly shows which community will be using that Mitigation Strategy.

In addition for the Responsible Agency it needs to clearly define which community will be the responsible Agency. If it is Town Staff, a list of each participating town will need to be added for each strategy or a statement needs to be added clearly defining that all communities are the Responsible Agency when \_\_\_\_\_ is stated. (Town Staff will have to be defined such as mayor, planner, administration department, etc)

The Reader of this plan should never have to assume. The plan has to clearly define who the **Responsible Party** will be and the **Jurisdiction** the Mitigation Strategies are intended for, so accountability can be assessed.

**Table 6.3 Chowan County Strategies:**

CH03 is identified as an “All Hazard” but the Mitigation Strategy states, “in the event of a hurricane”. Please change All Hazard to Hurricane.

CHO11 list some identified hazards but not all hazards in the Strategy wording. Suggested change would be to state, (...public and private schools to add all Mitigation Hazards prevention and preparedness information.)

Making these changes makes CHO11 and CHO16 (2) All hazards for Mitigation. CHO12 is a Response All Hazards.

**Table 6.4 Town of Edenton:**

ALL Hazard:

EDN1 is a “Recovery” All Hazard. It does not count towards Mitigation All Hazard. EDN7 how does “Systems for Safe Traffic Flow” apply to **Drought**? I suggest creating 2 new “All Hazard Strategies”. Once the changes are made for Chowan CHO11 and CHO16, something similar maybe used or Camden CAM13,15,18,20 some of those may suit Edenton.

**C4 “new and existing buildings and infrastructure”**

EDN3 can be used for Existing Buildings. Missing is New Building and infrastructure. For examples see Chowan CHO8, 9, 17 for New Structures and CHO18, or Camden County CAM15 for infrastructure. These are just a few examples.

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