
APPENDIX D.

NCEM/FEMA REVIEW COMMENTS

APPENDIX D: LOCAL MITIGATION PLAN REVIEW TOOL

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*.

Jurisdiction: Pender County	Title of Plan: Southeastern NC Regional Hazard Mitigation Plan	Date of Plan: October 7, 2015
Local Point of Contact: Tom Collins	Address: EMS Station 1/Emergency Operations Center 805 Ridgewood Avenue Burgaw, NC 28425	
Title: Emergency Management Director		
Agency: Pender County		
Phone Number: 910/259-1210	E-Mail: tcollins@pendercountync.gov	

State Reviewer: Quinn Woolard	Title: MITIGATION PLANNER	Date: 10/28/2015, 12/01/2015, 12/07/2015, 12/15/2015, 12/17/2015
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FEMA Reviewer: Linda L. Byers Darlene Booker (QC)	Title: RIV Sr. Lead Planning Specialist Hazard Mitigation Program Analyst	Date: December 30, 2015 January 21, 2016
Date Received in FEMA Region IV	December 29, 2015	
Plan Not Approved		
Plan Approvable Pending Adoption	January 19, 2016 ; recommend ADR after final meeting and receipt of Adoption Resolutions	
Plan Approved	April 26, 2016 (ADD lettrs:05-13,06-01,06-23,08-15)	

**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
Regulation (44 CFR 201.6 Local Mitigation Plans)				
ELEMENT A. PLANNING PROCESS				
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))	Section 1 Page 1-6 Appendix B <i>FEMA: All pages were validated</i>	X		
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))	Section 1 Page 1-6 Page 1-11 <i>FEMA: All pages were validated</i>	X		
A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))	Section 1 Page 1-11 <i>FEMA: All pages were validated</i>	X		
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))	Section 4 Page 4-7 to 4-11 <i>FEMA: All pages were validated</i>	X		
A5. Is there discussion of how the community (ies) will continue public participation in the plan maintenance process? (Requirement §201.6(c)(4)(iii))	Section 7 Page 7-4 <i>FEMA: All pages were validated</i>	X		
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))	Section 7 Page 7-2 to 7-4 <i>FEMA: All pages were validated</i>	X		

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
<u>ELEMENT A: REQUIRED REVISIONS</u>				
<i>FEMA Comments: The plan documentation is exemplary laying out the planning process of how the three counties were integrated into one regional plan but also how they maintained their distinct organizations. It is commendable that each entity was allowed to maintain their appropriate county strategies and provide input that contributed to the overall regional entire plan. More details in Section2)</i>				
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))	Section 3 Page 3-1 <i>FEMA: All pages were validated</i>	X		
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))	Section 3 Page 3-1 <i>FEMA: All pages were validated</i>	X		
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))	Section 5 Page 5-1 <i>FEMA: All pages were validated</i>	X		
B4. Does the Plan address NFIP insured structures within the jurisdiction that have been repetitively damaged by floods? (Requirement §201.6(c)(2)(ii))	Section 5 Page 5-17 <i>FEMA: All pages were validated</i>	X		
<u>ELEMENT B: REQUIRED REVISIONS</u>				
<i>Complete the following sentence: On average, the flood level during these flooding events was reported to be ___ feet (to be completed) above flood stage. (on page 3-11)</i>				
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))	Section 4 Page 4-1 <i>FEMA: All pages were validated</i>	X		
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))	Section 4 Page 4-7 to 4-11 <i>FEMA: All pages were validated</i>	X		
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))	Section 6 Page 6-3 <i>FEMA: All pages were validated</i>	X		

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
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))	Section 6 <i>FEMA: All pages were validated</i>	X		
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))	Section 6 Page 6-4 to 6-6 (and continuing) <i>FEMA: All pages were validated</i>	X		
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))	Section 6 Page 6-2 to 6-3 <i>FEMA: All pages were validated</i>	X		
<u>ELEMENT C: REQUIRED REVISIONS</u>				
<i>FEMA Concur: Elements C1, C2, C3, C4, C5 and C6 met the regulation requirements.</i>				
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))	Section 5 Page 5-19 <i>FEMA: All pages were validated</i>	X		
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))	Appendix G <i>FEMA: All pages were validated</i>	X		
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))	Appendix G <i>FEMA: All pages were validated</i>	X		
<u>ELEMENT D: REQUIRED REVISIONS</u>				
ELEMENT E. PLAN ADOPTION				
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))	Section 1, 7, and Appendix H	X		
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))	Section 1, 7, and Appendix H	X		

1. REGULATION CHECKLIST

Regulation (44 CFR 201.6 Local Mitigation Plans)

**Location in Plan
(section and/or
page number)**

**Met Not
Met Met**

ELEMENT E: REQUIRED REVISIONS

Adoption documentation has not been provided. Unsigned copies are included but must be signed and submitted to FEMA.

E1: The plan must include documentation of plan adoption, usually a resolution by the governing body or other authority.

E2: Each jurisdiction that is included in the plan must have its governing body adopt the plan prior to FEMA approval.

For additional information, please see Element E, Plan Adoption, in the "Local Mitigation Plan Review Guide", October 1, 2011, Pages 28-29 and Task 8 of the Local Mitigation Planning Handbook, March 2013.

Adoption Resolutions received are noted and highlighted in Section 3 of this PRT (9/22/16).Byers

ELEMENT F. ADDITIONAL STATE REQUIREMENTS (OPTIONAL FOR STATE REVIEWERS ONLY; NOT TO BE COMPLETED BY FEMA)

F1.			
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F2.			
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ELEMENT F: REQUIRED REVISIONS

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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-Strengths

- The 2015 Updated Mitigation Plan for three counties was completed in a new regional plan format. The state contracted with a new consultant for the development of the regional plan. Pender County procured the services of Holland Consulting Planners, Inc., (HCP) in 2015, of Wilmington, North Carolina, to assist in the development of a comprehensive Hazard Mitigation Plan Update for the three-county region. Following the establishing a work authorization with the planning consultant, Pender County set up an initial scoping meeting with the project consultant and regional stakeholders. The meeting involved a general discussion of how the project should be carried out, including establishing a Regional Mitigation Advisory as a team effort which was comprised of representatives from administration, planning/zoning, public works, fire/police, and other departments. These various interests are represented on each County MAC in order to efficiently address this "multi-disciplinary" aspect. The strength of the development of the plan was the inclusions of many stakeholders included in the three counties. Several meetings were held for each county to gain knowledge of what there the most pressing mitigation issues. These steps were well document in the appendices of the plan. Included in the plan are table and other panning documents. The planning process demonstrates who, how, and what were the objectives of the new regional plan. The Committee (MAC) was charged with the task to oversee plan development and included the following:
- 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 A: Planning Process-Opportunities for Improvement (Mitigation Handbook)

After sending an email or letter invitation, follow it up with a phone call to emphasize why participation is needed and to answer any questions.

- Send a formal invitation signed by the mayor, elected official, or department head.
- Plan the initial meeting at a convenient time and location for everyone.
- Provide beverages or food at meetings to bolster attendance and attention spans

Element B: Hazard Identification and Risk Assessment-Strengths

The Hazard and Risk Identification again is exemplary. The documentation of type, location, and extent reads like a geographical depiction of the planning area. The addition of the charts and tables make the plan very easy to find and understand how the plan developers included relevant and current data. The depiction of the various hazard events was excellently written. All of the following elements were included in the planning documentation:

- 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;
- The types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard areas; and
- A description of potential dollar losses to vulnerable structures, and a description of the methodology used to prepare the estimate.
- 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-Strengths

The Regional plan has incorporated a unique documentation strategy that addresses each county and participating jurisdiction by identifying the policies and procedures separately. The plan does a very detailed documentation of the Mitigation Strategy in the following manner to:

- The plan documents the links the vulnerability assessment to key problems identified in the risk identification by county and each jurisdiction.
- The Hazard Identification and Risk Assessment section provides a full scale of a blueprint for reducing potential losses identified by listing all of the current County strategies and provides a list of what the counties deemed important to their planning area.
- All actions have been updated and are intended to reflect the current needs and desires of the Regional Mitigation Advisory Committee and their respective jurisdictions.
- The new regional Plan utilizes a custom prioritization index in Section 6 (Tables 6-1 to 6-4) outline all implementing strategies to rank hazards, and then improves upon the index by offering clear and specific goals for each county and the participating jurisdictions with detailed specific mitigation actions. This approach is applicable and ensures actions are considered in the framework of the each local community's perspective and environment
- Each proposed mitigation action lists the responsible department or agency, the anticipated cost, the potential funding sources, the jurisdiction the action would take place within, the timeframe, and the status of the action. Such detailed write ups limit miscommunication and describe each proposed action comprehensively.
- The plan list each strategy with the responsible party and also how the strategies will be funded.
- Interesting, the plan also addresses CRS guidance for the counties participating in the regional plan. All jurisdictions participating in this plan which are members of the Community Rating System (CRS). This is extremely a well thought out process for the plan to move the communities forward in terms of improving CRS ratings. (Tables 6-2 through 6-4.)

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

The new regional plan incorporates all of the following requirements. In the development of the plan, there is considerable documentation of each county and the participation jurisdictions. Each section reads as a separate plan for the participations. It is very easy to separate out the various parts which makes the plan useable as needed. The Plan goes above and beyond minimum requirements to document how the plan will be evaluated and what Implementation measures with respect to the following were completed:

- Status of previously recommended mitigation actions;
- Identification of obstacles to 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
- *Discussion of how the mitigation goals and actions support the long-term community vision for increased resilience.*

B. Resources for Implementing Your Approved Plan

Mitigation Planning Toolkit:

This is an extensive web based tool to assist States, Local, and Tribal Communities involved in Hazard Mitigation Plan Development and Updates. The content will help guide the direction of plan development and required updates.

<http://www.fema.gov/library/viewRecord.do?id=5580>

Local Mitigation Planning Handbook:

This Handbook provides guidance to local governments on developing or updating hazard mitigation plans to meet the requirements under the Code of Federal Regulations (CFR) Title 44 – Emergency Management and Assistance §201.6.

Use the Local Plan Guide and Handbook in tandem to understand technical requirements

<http://www.fema.gov/library/viewRecord.do?fromSearch=fromsearch&id=7209>

Integrating Mitigation Strategies with Local Planning:

This resource provides practical guidance on how to incorporate risk reduction strategies into existing local plans, policies, codes, and programs that guide community development or redevelopment patterns.

<http://www.fema.gov/library/viewRecord.do?id=7130>

Mitigation Ideas:

- Communities can use this resource to identify and evaluate a range of potential mitigation actions for reducing risk to natural hazards and disasters.
<http://www.fema.gov/media-library/assets/documents/30627?id=6938>

SECTION 3:

MULTI-JURISDICTION SUMMARY SHEET (OPTIONAL- Complete jurisdiction name only)

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	F. State Requirements
1	Brunswick County	County					Y	Y	Y	Y	Y	
2	Bald Head Island	Village					Y	Y	Y	Y	Y	
3	Belville	Town					Y	Y	Y	Y	Y	
4	Boiling Spring Lakes	City					Y	Y	Y	Y	Y	
5	Bolivia	Town					Y	Y	Y	Y	Y	
6	Calabash	Town					Y	Y	Y	Y	Y	
7	Carolina Shores	Town					Y	Y	Y	Y	Y	
8	Caswell Beach	Town					Y	Y	Y	Y	Y	
9	Holden Beach	Town					Y	Y	Y	Y	Y	

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	Leland	Town					Y	Y	Y	Y	Y	
11	Navassa	Town					Y	Y	Y	Y	Y	
12	Northwest	Town					Y	Y	Y	Y	Y	
13	Oak Island	Town					Y	Y	Y	Y	Y	
14	Ocean Isle Beach	Town					Y	Y	Y	Y	Y	
15	Sandy Creek	Town					Y	Y	Y	Y	Y	
16	Shalotte	Town					Y	Y	Y	Y	Y	
17	Southport	Town					Y	Y	Y	Y	Y	
18	St. James	Town					Y	Y	Y	Y	Y	
19	Sunset Beach	Town					Y	Y	Y	Y	Y	
20	Varnamtown	Town					Y	Y	Y	Y	Y	
21	New Hanover County	County					Y	Y	Y	Y	Y	
22	Carolina Beach	Town					Y	Y	Y	Y	Y	
23	Kure Beach	Town					Y	Y	Y	Y	Y	

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	Wilmington	City					Y	Y	Y	Y	Y	
25	Wrightsville Beach	Town					Y	Y	Y	Y	Y	
26	Pender County	County					Y	Y	Y	Y	Y	
27	Atkinson	Town					Y	Y	Y	Y	Y	
28	Burgaw	Town					Y	Y	Y	Y	Y	
29	St. Helena	Village					Y	Y	Y	Y	Y	
30	Surf City	Town					Y	Y	Y	Y	Y	
31	Topsail Beach	Town					Y	Y	Y	Y	Y	
32	Watha	Town					Y	Y	Y	Y	Y	