

LOCAL MITIGATION PLAN REVIEW TOOL +HHPD

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

Jurisdiction: Monroe County, Pennsylvania	Title of Plan: Monroe County, Pennsylvania 2021 Hazard Mitigation Plan	Date of Plan: August 2021
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State Reviewer: Ernie Szabo	Title: State Planner	Date: August 19, 2021
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FEMA Reviewer: Joseph A. Bucovetsky	Title: Community Planner	Date: October 24, 2021 <i>2nd submission review completed</i> November 3, 2021
Joshua Norris (Reviewed for FY21 HHPD grant eligibility) Caroline Williams	MD FIT Hazard Mitigation Planner HM Community Planner	September 9, 2021 October 21, 2021
Date Received in FEMA Region <i>(insert #)</i>	1 st submission: September 9, 2021 <i>2nd submission: November 2, 2021</i>	
Plan Not Approved	1 st submission: Revisions required	
Plan Approvable Pending Adoption	<i>2nd submission: November 3, 2021</i>	
Plan Approved		

**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	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))		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))		X	
A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))		2 nd submission X	
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))		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))		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))		X	

1. REGULATION CHECKLIST		Location in Plan (section and/or	Met	Not Met
Regulation (44 CFR § 201.6 Local Mitigation Plans)				
ELEMENT A: REQUIRED REVISIONS				
<p>Recommended Revision: The Plan’s designation of the Local Planning Team as the body to meet annually and following each emergency declaration (Section 7.2) is a good one. The annual event should occur at the same time each year (such as a designated month) and, favorably, in sync with another event that would be drawing the same or similar group of participants together. This identification of the timing of the annual event should be present in Section 7.2. The position of the individual who is responsible for scheduling and convening the annual event, running it, reporting out on it, and following up on it (such as Director, County OEM) should also be identified in Section 7.2.</p> <p>Recommended Revision: The Local Planning Team should be broadly representative, but there are gaps in the current makeup of the group. Section 2.2 of the Plan states that the top industries in the county are health care and tourism, yet there does not appear to be representation from either sector on the Local Planning Team. Section 2.2 of the Plan also states that the Tobyhanna Army Depot is the largest employer in the county, although it does not appear to be represented on the Team. These sectors/businesses/ employers should be added to the Local Planning Team in time for its first post-update annual meeting.</p> <p>Recommended Revision: Section 2.2, <u>Community Facts</u>, would be made stronger by providing more specific information on the major employers in the county. In particular, the number of employees for each of the top 20 employers should be added to Table 1.</p> <p>Recommended Revision: In Section 2.2, the Plan discusses the importance of tourism for Monroe County’s economy. To underscore this, the Plan would be strengthened by containing more information on the tourism sector. Data such as percentage of economic activity and absolute revenue amounts associated with tourism should be added to the Plan.</p> <p>Recommended Revision: The <i>Location in Plan</i> information provided in the <u>Plan Review Tool</u> that accompanied the Hazard Mitigation Plan submission has proven to be virtually unusable to the FEMA reviewers. Aside from parts of the Executive Summary and the first couple of Sections in the document, none of the page numbers cited match with the section/subsections noted nor with the information provided in the Plan relevant to the regulations quoted. <i>Location in Plan</i> information should be accurate on submitted <u>Plan Review Tools</u>.</p>				
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))			2 nd submission 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))			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))			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))			X	

1. REGULATION CHECKLIST		Location in Plan (section and/or	Met	Not Met
Regulation (44 CFR § 201.6 Local Mitigation Plans)				
ELEMENT B: REQUIRED REVISIONS				
<p>Recommended Revision: <i>Municipal Flood Maps</i>, such as those contained in Appendix D, can be valuable content in a Hazard Mitigation Plan, but only if adequate at-risk delineations are also present. As things presently stand, the myriad of dots denoting Site Address Points on the Municipal Flood Maps fails to convey much useful information.</p> <p>Nearby, in Appendix E, are lists of <i>Critical and Special Needs Facilities</i>. This information, in its present form, also fails to convey much. The problem is that the Critical and Special Needs Facilities stuck in Appendix E are stranded from any geographic mooring.</p> <p>These two data pieces should be combined, with Critical and Special Needs Facilities geolocated on the Municipal Flood Maps so that, among other things, those Critical and Special Needs Facilities that are in the Special Flood Hazard Area (SFHA) may be quickly and easily discerned. This data integration action then can provide a significant resource to municipalities and the County in identifying and prioritizing potential mitigation actions and projects.</p> <p>Recommended Revision: The HAZUS flood scenario is presented in Appendix F and discussed in Section 4.3.4.2 but better mapped at-risk facilities and structures than what can be seen in Appendix F are needed to make the HAZUS runs outputs useful in the context of hazard mitigation planning. A good part of the reason to do the HAZUS study is to be able to identify the locations of the most vulnerable properties in the county. The discussion of the HAZUS findings in Section 4.3.4.2 should include detailed maps there (or in an appendix) that permit the reader to see clearly where the most at-risk facilities and structures are in each of the relevant municipalities. Similar to the points made above concerning the desired relationship of <i>Municipal Flood Maps</i> to <i>Critical and Special Needs Facilities</i>, this mapping can provide a significant resource to municipalities and the County in identifying and prioritizing potential mitigation actions and projects.</p>				
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))			2 nd submission 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))			X	
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))			X	
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))			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))			X	

1. REGULATION CHECKLIST		Location in Plan (section and/or	Met	Not Met
Regulation (44 CFR § 201.6 Local Mitigation Plans)				
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))			2 nd submission X	
<u>ELEMENT C: REQUIRED REVISIONS</u>				
<p>Recommended Revision: An important hazard mitigation planning step for Monroe County should be made by explicitly connecting the municipality-by-municipality hazard ranking in Tables 74 through 92 to the <i>Mitigation Action Plan</i> in Table 100 and the <i>Municipal Project Opportunities</i> in Appendix G. This is hinted at in the current Table 100 under Action 4.2.1, the only row in the table that mentions specific municipal entities [including East Stroudsburg University] as 'local champion[s]' for a mitigation action, but the tie-in is still more with Table 101 than with Appendix G. Ideally, a direct link can be shown from a hazard in Tables 74 through 92 to a description of an action in Table 100 to a specific project in Appendix G. Explicitly making this connection in the <u>Mitigation Strategy</u> section of the HMP should position a jurisdiction for favorable consideration for a grant to implement a mitigation project.</p> <p>Recommended Revision: Section 5, <u>Capability Assessment</u>, falls short of what a Section covering this topic should reveal. A set of summary tables that succinctly presents all of the capabilities (planning and regulatory, administrative and technical, financial, education and outreach) of all of the jurisdictions in the planning area would go a long way toward communicating to the reader the basic state of affairs in terms of Monroe County's jurisdictions' capabilities. In addition, the Plan Developer's assessment of those capabilities (not the municipalities assessment of themselves) would supply a critical evaluation of that state of affairs and point the way in terms of future actions to support and possibly augment those capabilities. The next update of the Monroe County HMP should aim to achieve these marks for the <u>Capability Assessment</u> section of the HMP document.</p>				
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))			X	
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))			X	
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))			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))				
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))				

1. REGULATION CHECKLIST		Location in Plan	Met	Not Met
Regulation (44 CFR § 201.6 Local Mitigation Plans)		(section and/or		
<u>ELEMENT E: REQUIRED REVISIONS</u>				
ALL DAM RISKS - ELIGIBLE HIGH HAZARD POTENTIAL DAMS				
HHPD1. Did Element A4 (planning process) describe the incorporation of existing plans, studies, reports, and technical information for eligible high hazard potential dams?	Section 5.2.5 Plan Integration on page 291			X
HHPD2. Did Element B3 (risk assessment) address eligible high hazard potential dams in the risk assessment?	Section 4.3.11 Dam and Levee Failure on pages 152-165, and pages 174, 264 - 265			X
HHPD3. Did Element C3 (mitigation goals) include mitigation goals to reduce long-term vulnerabilities from eligible high hazard potential dams that pose an unacceptable risk to the public?	Objective 7.2 under goal 7 on page 309, and pages 319 - 320			X
HHPD4. Did Elements C4-C5 (mitigation actions) prioritize mitigation actions to reduce vulnerabilities from eligible high hazard potential dams?	Actions 7.1.1, 7.1.2, 7.1.3, 7.2.1, 7.2.2, and 7.2.3, and pages 310 – 349.		X	

REQUIRED REVISIONS

RECOMMENDED REVISIONS (Required to be eligible for FY21 HHPD grant funds):

HHPD1: Describe how the state dam safety agency coordinated with the jurisdiction and/or local dam owners. If, dam safety coordination was limited or did not occur, then add narrative to explain this limitation.

HHPD2: Describe all dam risk, namely incremental, non-breach, and residual risk. A summary narrative description of all dam risk is acceptable. Relevant definitions are included below.

Source: "Rehabilitation of High Hazard Potential Dams Grant Program Guidance," June 2020

Incremental Risk: *The risk (likelihood and consequences) to the pool area and downstream floodplain occupants that can be attributed to the presence of the dam should the dam breach prior or subsequent to overtopping, or undergo component malfunction or misoperation, where the consequences considered are over and above those that would occur without dam breach. The consequences typically are due to downstream inundation, but loss of the pool can result in significant consequences in the pool area upstream of the dam.*

Non-Breach Risk: *The risk in the reservoir pool area and affected downstream floodplain due to 'normal' dam operation of the dam (e.g., large spillway flows within the design capacity that exceed channel capacity) or 'overtopping of the dam without breaching' scenarios.*

Residual Risk: *The risk that remains after all mitigation actions and risk reduction actions have been completed. With respect to dams, FEMA defines residual risk as "risk remaining at any time" (FEMA, 2015, p A-2). It is the risk that remains after decisions related to a specific dam safety issue are made and prudent actions have been taken to address the risk. It is the remote risk associated with a condition that was judged to not be a credible dam safety issue.*

HHPD2: Describe the risks and vulnerabilities to and from eligible HHPDs, including:

- Potential cascading impacts of storms, seismic events, landslides, wildfires, etc. on dams that might affect up and downstream flooding potential in terms of breach, non-breach, and residual risk.
- Potential significant social impacts as well as multijurisdictional impacts from a dam incident.
- Location and size of populations at risk from eligible HHPDs as well as potential impacts to institutions and critical infrastructure/facilities/lifelines.
- Documentation of limitations and the approach to address deficiencies.

HHPD3: Link proposed mitigation actions that reduce long-term vulnerabilities from HHPDs to other HMP goals. For example, include a column in Table 100 that lists the multiple 2021 Monroe County goals associated with each HHPD related mitigation action within the plan. Alternatively, add narrative explaining how the HHPD mitigation actions within the plan are tied to other 2021 Monroe County HMP goals (beyond goal 7).

1. REGULATION CHECKLIST

Regulation (44 CFR § 201.6 Local Mitigation Plans)

**Location in
Plan
(section and/or**

Met

**Not
Met**

RECOMMENDED REVISIONS (Not required to be eligible for FY21 HHPD grant funds):

HHPD1: For the next update or plan amendment, include a description of additional types of dam-related data (beyond information from the National Inventory of Dams) that have been integrated into the plan, such as the location and size of the PAR, potential impacts to institutions and critical infrastructure/facilities/community lifelines, EAPs, HEC-RAS, DSS-WISEHCOM, DSS-WISE Lite, FLO-2D, or more detailed studies.

HHPD2: Though the HMP states that there "...have been no occurrences of dam failure or major incidence occurring at the locations of dams in Monroe County. Smaller incidences have occurred but have not had significant impacts in the county..." submitted local hazard identification and risk assessment worksheets in Appendix C describe incidents of dam failure that have occurred since the last plan update. For example, Eldred Township stated that a Knots Lake Dam failure occurred in 2020 and Price Township highlighted that an increase in dam failure has been observed at the Stillwater and Hallowood dams. Consider explicitly describing the reported dam failures in Appendix C within the narrative of the risk assessment.

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

F1.			
F2.			

ELEMENT F: REQUIRED REVISIONS

