

# **Appendix I:**

## **Local 322 plan GAP Analysis**

Final Report

# Local Hazard Mitigation Plan Update Gap Analysis for Region III States Commonwealth of Virginia

FEMA Region III

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**FEMA**

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## **Acronyms and Abbreviations**

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CFR	Code of Federal Regulations
DMA 2000	Disaster Mitigation Act of 2000
FEMA	Federal Emergency Management Agency
FMA	Flood Mitigation Assistance
HIRA	Hazard Identification and Risk Assessment
HMGP	Hazard Mitigation Grant Program
PDC	Planning District Commissions
PDM	Pre-Disaster Mitigation
VDEM	Virginia Department of Emergency Management



## 1. SECTION ONE INTRODUCTION

### 1.1 BACKGROUND

The Federal Emergency Management Agency's (FEMA) Region III covers five States and the District of Columbia. The five States are Delaware, Maryland, Pennsylvania, Virginia, and West Virginia. The five States in the Region include more than 3,400 local jurisdictions. To date, approximately 72 percent of the population in these five States are covered by hazard mitigation plans—either single or multi-jurisdictional plans.

By April of 2009, a large number of the local plans will be approaching or will have passed their expiration date. In a meeting between the Region and State Hazard Mitigation Officers in October 2007, the States identified issues such as limited budgets and lack of staff to assist communities and review mitigation plans. As a result of the October meeting, FEMA Region III decided to conduct a Gap Analysis for each State identifying the anticipated needs for assisting local jurisdictions with the update, review, and approval of their mitigation plans in accordance with Title 44 Code of Federal Regulations (CFR) Part 201.

The current Virginia Commonwealth Hazard Mitigation Plan was approved by FEMA in March 2007. It meets the definition of an enhanced plan.

### 1.2 PURPOSE

The purpose of the Gap Analysis for the Commonwealth of Virginia is to:

- Document the Commonwealth's processes and resources for the continued development and update of local mitigation plans and identify the Commonwealth's ability to support these efforts through funding and technical assistance
- Document the current outreach efforts provided by the Commonwealth of Virginia and identify any unmet needs for local communities
- Review the Virginia Department of Emergency Management's (VDEM) updated plan by reviewing recommendations;
- Identify the training needs of Commonwealth staff for review of local hazard mitigation plans and of local communities to develop or update local hazard mitigation plans
- Estimate the timeframe for the Commonwealth review process and establish a schedule for local plan updates

### 1.3 PROCESS

To help identify the needs of Virginia, Region III met with Deborah Mills, Virginia's Commonwealth Hazard Mitigation Officer and the Commonwealth Hazard Mitigation Planner on February 27, 2008 in a meeting facilitated by URS Corporation. A few general questions were prepared by the contractor as points of discussion on various topics, including:

1. Virginia's process and resources for the continued development and update of local mitigation plans, and the Commonwealth's ability to support these efforts through funding and technical assistance.
  - a. What Pre-Disaster Mitigation (PDM) and Hazard Mitigation Grant Program (HMGP) grants have been applied for on behalf of the local governments for plans and projects?
  - b. How do local plans inform or become integrated with the Commonwealth Plan?
2. Lessons learned by Virginia through previous experience with the hazard mitigation planning process.
  - a. What obstacles were encountered and what could have been done better?
  - b. What approaches have led to successful outcomes?
3. Outreach efforts that Virginia provides to local communities.
  - a. What types of training and technical assistance does Virginia provide to local jurisdictions?
  - b. What is Virginia's strategy for assisting local jurisdictions in developing new plans and updating plans? For example, what funding is available? What types of assistance can the Commonwealth provide to improve the quality of plans?
  - c. What types of training would Virginia like to offer for Commonwealth and local community staff to improve the plan development, update, and review processes?
4. Involvement of other Virginia agencies in the planning process.
  - a. How were various Commonwealth agencies (e.g., Department of Transportation, Department of Environmental Quality, Department of Education, Department of Planning, etc.), involved in the planning process?
  - b. How are Commonwealth agencies involved in the plan maintenance process?
  - c. How have the local goals and objectives been incorporated into the Commonwealth Plan and to what extent are Commonwealth goals integrated into local plans?
  - d. How have local risk and capability assessments been incorporated into the Commonwealth Plan?
5. Upcoming local plan updates and the Commonwealth review process.
  - a. How long does it typically take to complete a plan review?
  - b. What efforts does the Commonwealth anticipate making to ensure that the local plans do not lapse?
  - c. How long has it generally taken for counties and municipalities to formally adopt approvable plans?

After the initial meeting, the interview data was organized and analyzed to identify the key concerns of Commonwealth staff and to identify actions that might be implemented by the Commonwealth of Virginia and FEMA Region III in the coming months to facilitate the process

of updating and reviewing local hazard mitigation plans. The next section presents these findings and recommendations.

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## 2. SECTION TWO GAP ANALYSIS

### 2.1 INTRODUCTION

A complete Gap Analysis explains the current status of a program, states the program objectives, identifies any gaps that exist between the current status and the objectives, and proposes a plan for closing these gaps. The section contains nine subsections that constitute the first part of a complete Gap Analysis: explanation of the current program status.

The sections are organized as follows:

1. Virginia's processes and resources for the continued development and update of local mitigation plans and the Commonwealth's ability to support these efforts through funding and technical assistance
2. Integration of the Commonwealth Plan with local plans
3. Involvement of Commonwealth agencies and interdepartmental coordination
4. Technical assistance and outreach efforts for review and development of new or updated local hazard mitigation plans
5. VDEM's update and review process
6. Adoption and plan maintenance procedures
7. Timeframes and schedules required for local plan updates and the Commonwealth review process
8. Prioritization for funding
9. Success Stories

Each section presents findings and recommendations. The findings are based on information from the meeting that was held on February 27, 2008, as well as a review of the Commonwealth Hazard Mitigation Plan. Of particular relevance are the sections of the plan that describe how the Commonwealth of Virginia coordinates local mitigation planning, and summaries of local capabilities, mitigation actions, processes, and resources. The recommendations are based on the findings or identified gaps, and suggest the direction the Commonwealth or Region might take to begin to close the gaps.

### 2.2 VIRGINIA'S PROCESSES AND RESOURCES FOR THE CONTINUED DEVELOPMENT AND UPDATE OF LOCAL MITIGATION PLANS AND THE COMMONWEALTH'S ABILITY TO SUPPORT THESE EFFORTS THROUGH FUNDING AND TECHNICAL ASSISTANCE

#### 2.2.1 Findings

The Virginia Commonwealth has 95 counties, 39 cities, and 190 incorporated towns, each of which has independent land use management authority within their boundaries. Within the Commonwealth, there are 21 Planning District Commissions (PDCs), which are regional

planning organizations that provide technical and planning support to the localities within their regions and serve as centers for regional initiatives. Many rural communities have limited staff capability to prepare their own hazard mitigation plans. Consequently, in 2002 the Commonwealth determined that approaching mitigation planning regionally under the direction of the PDCs would be appropriate to reduce costs and to improve plan quality. The following table summarizes the number of individual counties and cities due to adopt updated plans between 2009 and 2012.

#### Summary of Plan Update Schedule - Virginia

Update Year	Number of Jurisdictions
2009	2
2010	60
2011	164
2012	33

While the PDCs perform land use planning at the request of their localities, they cannot implement or enforce the plans they create for those localities. Implementation and enforcement remains the responsibility of the cities, counties, and towns for which plans were developed. Local jurisdictions control land use through plans, ordinances, and codes and Commonwealth agencies generally manage Commonwealth facilities in a manner that is consistent with local comprehensive planning and zoning.

To date, between \$3 and \$4 million has been invested in the development of local hazard mitigation plans and the Commonwealth Plan. Twenty-three regional plans have been adopted by local jurisdictions in more than one county. Only the Cities of Chesapeake, Poquoson, and Franklin and Amelia County produced single jurisdiction plans. The Southampton County plan has been adopted by jurisdictions only within that county.

The PDCs have been divided by VDEM into four categories based on the local plan expiration dates. Planning regions whose plans expire in 2010 will require the most immediate attention of VDEM. These are:

- PDC 3 (Mount Rogers) – Received PDM funding to prepare the initial plan. This is a very poor area and is the PDC is more reluctant to do mitigation planning than the other PDCs.
- PDC 4 (New River Valley) – Received Flood Mitigation Assistance (FMA) funds to prepare the initial plan. Technical assistance will be needed to update the risk assessment and improve the quality of the plan.
- PDC 9 (Rappahannock Rapidan) – Received HMGP funding to prepare the initial plan. This PDC will require technical assistance to update the risk assessment portion of the plan.
- PDC 14 (Commonwealth Regional Council – Piedmont) – This PDC will require technical assistance to update the risk assessment portion of the plan.

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Planning regions whose plans expire in 2011 are:

- PDCs 1 and 2 (Lenowisco and Cumberland Plateau) – The counties in these regions do not have funding available to financially support the plan updates.
- PDC 5 (Roanoke Valley – Alleghany) – VDEM has identified no particular needs for this PDC.
- PDC 6 (Central Shenandoah) – This PDC won the James Lee Witt award at the Association of State Floodplain Managers Conference. Increased participation by other jurisdictions in the region is needed.
- PDC 17 (Northern Neck) – This PDC is very active but will require additional funding to update the plan.
- PDC 18 (Middle Peninsula) – This PDC will require additional funding to update the plan.
- PDC 19 (Crater) – VDEM has identified no particular needs for this PDC.

Community participation during the entire planning process is crucial to the success of the plan. VDEM has found that communities with good rates of participation during the planning process were more successful in implementing the mitigation plans than were communities with less participation. VDEM has also found that some communities participated minimally in plan development but failed to adopt the plans after the plans were approved by FEMA.

VDEM has developed a hazard mitigation tool kit for local jurisdictions, which is comprised of a summary of the Disaster Mitigation Act of 2000 (DMA 2000) planning requirements, HMGP guidance, and the FEMA 386 series of How-To Guides. Nevertheless, some communities remain unaware of the requirements for a local mitigation plan.

## 2.2.2 Recommendations

1. Encourage local jurisdictions to include information about severe repetitive flood loss in their updated plans and to continue to participate in the National Flood Insurance Program so they will be eligible to receive FMA funds for flood mitigation projects.
2. Develop a strategy so that communities will adopt approved plans. Show, for example, how a plan does more than establish eligibility for certain funding but can also compliment transportation, emergency evacuation, land use, and stormwater management objectives. Find examples that demonstrate the unfortunate consequences other communities without plans have experienced during a disaster.
3. Identify additional sources of funding to assist PDCs with plan updates.
4. Provide technical assistance workshops about updating plans using the recently revised FEMA G-318 Mitigation Planning Workshop to representatives of PDCs and local jurisdictions.

## 2.2.3 Conclusion

Increased funding and technical assistance, as well as participation in and awareness of mitigation planning, are needed in some parts of the Commonwealth.

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## 2.3 INTEGRATION OF THE COMMONWEALTH PLAN WITH LOCAL PLANS

### 2.3.1 Findings

The Hazard Identification and Risk Assessment (HIRA) section of the Commonwealth Plan was used by the local communities in developing their initial hazard mitigation plans. The Commonwealth is currently in the process of revising the HIRA and expects to have it completed by the fall of 2008. This update will incorporate data from the HIRAs in local plans and will again be available for updating local plans.

VDEM staff is in the process of incorporating all remaining relevant data from the approved local plans into a comprehensive commonwealth wide database. The objective is to integrate local risk analysis data, mitigation goals, and proposed actions with the Commonwealth Hazard Mitigation Plan. These data are: 1) final plan approval dates; 2) list of prioritized mitigation strategies; 3) project types; 4) identified funding sources; 5) estimated project timeframes; and 6) status of identified mitigation projects. The 2007 Enhanced Commonwealth Hazard Mitigation Plan update states that this effort will provide more comprehensive HIRAs for upcoming plan revisions, as well as provide a basis for HMGP applications resulting from a disaster declaration.

### 2.3.2 Recommendations

1. Continue to share Commonwealth HIRA data with the PDCs and local jurisdictions to facilitate the development of mitigation strategies that cross regional boundaries.

### 2.3.3 Conclusion

The Commonwealth actively incorporates data from local plans into the Commonwealth Plan and provides data developed at the Commonwealth level for use in local plans. No plan integration needs have been identified.

## 2.4 INVOLVEMENT OF COMMONWEALTH AGENCIES AND INTERDEPARTMENTAL COORDINATION

### 2.4.1 Findings

The Commonwealth of Virginia's Plan was originally approved by FEMA Region III in September 2004. The plan was updated and augmented with information on severe repetitive loss and repetitive flood loss properties and was approved by FEMA as an Enhanced Plan in March 2007.

The 2007 Commonwealth Plan documents cooperation among several agencies in the development of the plan. More than 105 Commonwealth and Federal agencies, non-profit organizations, and Virginia colleges and universities participated in the planning process. Representatives attended four meetings of the Commonwealth Hazard Mitigation Steering Committee or participated in meetings of one of the sub-committees. The sub-committees focused on structural mitigation actions, compilation of data, planning policy and funding, and outreach and public education. Representatives of various agencies provided critical facilities

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data, submitted hazard mitigation strategies and projects, ranked activities, and reviewed the plan draft.

Interdepartmental coordination is also apparent in integration with other planning initiatives, such as:

- Local jurisdictions in Virginia address some natural hazards in the planning and development process, primarily through development of comprehensive land use plans, zoning, and enforcement of the Uniform Commonwealth wide Building Code.
- Flood and hurricane zones are addressed through floodplain management ordinances, which are usually incorporated into a zoning ordinance.

## 2.4.2 Recommendation

1. Continue engage various Commonwealth agencies in hazard mitigation planning and project implementation.

## 2.4.3 Conclusion

Many Commonwealth agencies have actively participated in mitigation planning with the Commonwealth. No needs have been identified.

## 2.5 TECHNICAL ASSISTANCE AND OUTREACH EFFORTS FOR REVIEW AND DEVELOPMENT OF NEW OR UPDATED LOCAL HAZARD MITIGATION PLANS

### 2.5.1 Findings

To support the development of local hazard mitigation plans, VDEM provides assistance to local and regional jurisdictions. VDEM Hazard Mitigation staff provides plan implementation support for the 27 approved local and regional mitigation plans. VDEM mitigation planning staff includes the Planning Coordinator and two planning specialists. VDEM staff attends three or four meetings each year with each local mitigation plan steering committee to discuss plan implementation, funding issues, plan maintenance, and plan revision.

Staff provides mitigation support through participation in local meetings and consultation by phone. In the past, VDEM has received support from FEMA Region III through the Hazard Mitigation Technical Assistance Program in the areas of technical assistance, training workshops, and review of crosswalks.

During the preparation of the initial local mitigation plans, VDEM staff delivered the following technical assistance to the PDCs:

- Administered PDM and FMA grant funds for six PDCs
- Conducted a workshop on the local mitigation planning process
- Developed local mitigation planning assistance guidance
- Provided direct planning and technical assistance to jurisdictions

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- Provided presentations to Commonwealth professional organizations at conferences and workshops that detailed the requirements of DMA 2000 and the Commonwealth's efforts to meet those requirements
  - Developed draft plan outlines for use at local and regional levels
  - Compiled hazard data at the Commonwealth level for use in local plans
  - Reviewed sections of draft plans and final plans prior to submission to FEMA Region III for final approval

No funding is available for local plan updates during the next few years. Because the risk and vulnerability section of local plans will require the most extensive updating, VDEM staff would like to provide technical assistance, with the assistance of FEMA Region III, on assessing risk and vulnerability.

### 2.5.2 Recommendations

1. With the assistance of Region III, provide technical assistance on risk analyses and assessment of vulnerability.

### 2.5.3 Conclusion

Local communities need technical assistance to update their plans.

## 2.6 COMMONWEALTH UPDATE AND REVIEW PROCESS

### 2.6.1 Findings

The Commonwealth of Virginia Commonwealth Hazard Mitigation Plan was updated, improved, and submitted to FEMA Region III for review in November 2006. After further revisions, the plan was approved in March 2007 as an Enhanced Commonwealth Plan. If there is a presidential disaster declaration, the Commonwealth Plan will be evaluated and may be revised if appropriate.

VDEM planners attend meetings and professional development workshops to offer the best possible assistance to local jurisdictions on plan development and plan implementation. VDEM planners intend to institute a system of monthly contacts with local plan sponsors to monitor the status of plans and to require annual written reports from each plan sponsor to document hazard mitigation accomplishments. This system will provide information that will be useful for updating the Commonwealth Plan.

As indicated above, local plans are expected to be updated between 2009 and 2012, and Commonwealth staff will review each plan as it is submitted. No need for assistance on plan review has been identified.

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## 2.6.2 Recommendations

1. Analyze data gathered through the monthly contacts and annual reports to identify local needs for assistance in completing grant applications.
2. Use the monthly contacts to explain mitigation planning to new local staff and to increase support for mitigation planning.

## 2.6.3 Conclusion

VDEM has a system for gathering data for the update of the Commonwealth Plan and has sufficient staff for reviewing local plan updates. No needs have been identified.

## 2.7 ADOPTION AND PLAN MAINTENANCE PROCEDURES

### 2.7.1 Findings

Some towns have not adopted plans, which VDEM attributes to a lack of interest in the planning process. However, because Virginia is a Commonwealth, these municipalities can still apply for HMGP project funding through the county. Loudoun County is the only county that has not adopted an approved hazard mitigation plan.

VDEM has developed an Annual Report form, which is distributed to all communities and asks them to document the status of hazard mitigation actions and to evaluate their plan. Actions proposed in the mitigation plan are categorized as: completed, in progress, not started/delayed, modified, or cancelled. The Annual Report form also captures information on the number of people protected by a mitigation action and the number of structures mitigated. The form asks whether the HIRA has been updated and whether the community has involved the public in the plan maintenance process.

VDEM has developed a Local and Regional Mitigation Plan Strategies Database with approximately 1,976 records that reflect the strategies proposed in local plans. This database is used to review and prioritize potential mitigation projects and select them for implementation as funding becomes available.

### 2.7.2 Recommendations

1. Utilize the findings from analysis of the Annual Reports or the Mitigation Strategies Database to demonstrate the value of having a mitigation plan to communities that have not adopted a plan.

### 2.7.3 Conclusion

More local jurisdictions need to adopt mitigation plans.

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## 2.8 TIMEFRAMES AND SCHEDULES REQUIRED FOR LOCAL PLAN UPDATES AND THE COMMONWEALTH REVIEW PROCESS

### 2.8.1 Findings

VDEM typically reviews the plan within 30 days of receipt from a PDC and then forwards it to FEMA, if the plan appears to meet all FEMA requirements. If revisions are required, VDEM does not forward the plan to FEMA but informs the locality/region of the necessary changes. VDEM monitors the expiration dates of the local plans, contacts the regional and local planning committees to remind them of upcoming expiration dates, and suggests that they consider applying for Federal planning grant funds.

The plan adoption process depends on the locality, some localities adopt the plan within the first month after FEMA approval while others take longer to put it on their agenda, and some even decide not to adopt the plan.

### 2.8.2 Recommendations

1. Emphasize the importance of adopting a plan soon after the plan receives FEMA approval because it will expire 5 years after the first community adopts the approved plan.

### 2.8.3 Conclusion

Local jurisdictions need to adopt mitigation plans shortly after they receive FEMA approval.

## 2.9 PRIORITIZATION FOR FUNDING

### 2.9.1 Findings

The Commonwealth Plan prioritizes local plan funding for:

- Areas with recent disaster events
- Areas planning regionally
- Regions or localities ready to begin their planning efforts
- Areas with greater development pressures or density
- Areas with greater probability of hazards occurring
- Areas with repetitive losses not covered by other priority considerations
- Other areas, as funding becomes available

### 2.9.2 Recommendations

1. Continue to prioritize funding for local plans as identified above.

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### 2.9.3 Conclusion

No needs have been identified for the Commonwealth prioritization process.

## 2.10 SUCCESS STORIES

### 2.10.1 Findings

Approximately 98 percent of the population of the Commonwealth is covered by a hazard mitigation plan. Loudoun County is the only county without a plan.

Developing plans through PDCs has been a very successful approach for hazard mitigation planning.

VDEM has the staff and technical capability to assist communities with their plan development and updates. VDEM expects to be able to hire two additional full time planners. Staff is adequate to provide outreach to local jurisdictions.

The following are just a few examples of the numerous mitigation projects that have been successfully completed:

- City of Franklin – After Hurricane Floyd (1999), the City elevated and moved public buildings, devised a warning system for the downtown area, and acquired and demolished thirteen of the most floodprone houses. In 2006 when the Blackwater River crested, the mitigation measures proved effective and dramatically reduced damages.
- Gloucester – The City elevated a house after Hurricane Isabel in 2003. When Tropical Depression Ernesto flooded the neighborhood in 2006, the house was not flooded.
- City of Poquoson – In June 2006 the town of Poquoson began its first elevation project with 17 houses scheduled for elevation during the first phase of the project. On August 18, 2006 the first elevation was completed just before Tropical Depression Ernesto and an October storm flooded the neighborhood. The elevated house was not flooded.

### 2.10.2 Conclusion

The Commonwealth is building a record of successful mitigation projects and has had some opportunity to estimate the losses avoided.

### 2.10.3 Summary

It appears that the hazard mitigation planning process is generally successful in Virginia. VDEM should continue to implement its current initiatives in providing technical assistance to local communities. Interview data reveal that local communities in Virginia will need additional funding and technical support to implement the plan update process and that there is a need for communities to adopt their mitigation plans shortly after they are approved by FEMA.