

Chapter 7 **Plan Monitoring, Maintenance & Revision**

Disaster Mitigation Act of 2000

§201.4(c)(5): A Plan Maintenance Process that includes:

- (i) An established method and schedule for monitoring, evaluating, and updating the plan.**
- (ii) A system for monitoring implementation of mitigation measures and project closeouts**
- (iii) A system for reviewing progress on achieving goals as well as activities and projects identified in the Mitigation Strategies.**

§201.4 (d): Review and updates. Plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities and resubmitted for approval to the appropriate Regional Director every three years. The Regional review will be completed within 45 days after receipt from the State, whenever possible. We also encourage a State to review its plan in the post-disaster time frame to reflect changing priorities, but it is required.”

7.1 Plan Monitoring Procedures

The Commonwealth of Virginia Hazard Mitigation Plan was developed and updated with the understanding that as events occur, new policies and procedures are added and subtracted, and other unforeseen circumstances can cause certain elements of the plan to require revisions. It is important to establish a comprehensive monitoring system to ensure that the plan remains a fluid living document that is regularly being reviewed by VDEM mitigation staff and necessary steering committee members. This will prevent the plan from becoming an unused shelf document.

Methods for monitoring, tracking, and revising the plan were evaluated by VDEM mitigation planning coordinators and have been updated as necessary. The CVHMSC was also given the opportunity to comment on this section. The thought process for revising this section involved realistic tracking mechanisms, continued collaboration with the state hazard mitigation steering committee, and ensuring that this plan is revisited frequently before, during and after disaster events in the Commonwealth.

7.1.1 Tracking Strategies and Projects

The Commonwealth of Virginia Hazard Mitigation Plan provides guidance for hazard mitigation within the Commonwealth. Its vision is supported by goals,



categories and strategies for Virginia state government that will reduce or prevent injury from all hazards to citizens and critical state facilities. The 119 strategies and projects that support the categories organized within the four goal groups were submitted by Virginia state agencies, colleges and universities along with federal agency cooperators and related organizations. New strategies and projects were submitted through the new strategy submittal form found in Appendix D. As described in part 5.2 of Chapter 5, the “Vision, Goals, Categories, and Strategies” section, strategies were prioritized through a state steering committee meeting in September 2009.

As state hazard mitigation plans must be revised three years after FEMA approval, Virginia agencies that initiated a strategy or project were asked to report on the progress and accomplishments of each strategy from 2006 – 2009. An annual strategy report was developed by VDEM mitigation planning coordinators to make it easy for state agency contacts to report on the progress of their strategies. This not only allowed VDEM mitigation planning coordinators to monitor plan implementation, but also simplified the reporting process for the plan revision. A sample annual state strategy report can be found in Appendix D, through this form state agencies were able to report on the following:

- Overall Status
- Change In Priority
- Were Goals and Categories Achieved?
- Final Cost, Cost Effective?
- Funding Source
- Number of People and Structures Protected
- Losses Avoided
- Are State Mitigation Goals Still Relevant?

This reporting process worked well during the 2006 through 2009 reporting period and it will continue to be the reporting method for 2010 through 2013. VDEM mitigation planning coordinators will be responsible for requesting and maintaining this information for the next three year revision. This chapter discusses how improving steering committee communication will tie into the annual reporting process.

7.1.2 Mitigation Database and Human-Caused Hazards

Due to funding constraints, the mitigation database that was outlined in the previous plan maintenance section has not been implemented. There are however certain aspects of the mitigation database that are in place but a comprehensive data “warehouse” has not been established. As discussed in Chapter 6, VDEM does have a mitigation strategy spreadsheet that has every strategy from all 27 local hazard mitigation plans. This spreadsheet is and will be used to assist in developing post-disaster local hazard mitigation projects. This spreadsheet has also been divided up by regional plans, and is used as an annual tracking



mechanism for local hazard mitigation strategy implementation. The spreadsheet can be found in Enhanced Appendix 10.

For storing and updating historical hazard events, a comprehensive HIRA revision has taken place for this plan update. The goal of the HIRA sub-committee is to meet at least twice a year to discuss data improvements, recent events, and additional analysis as needed. This is outlined in strategy H-3 which has been modified after combining two strategies from the 2007 plan. A lesson learned from the revised HIRA is that waiting for 5 years to revise this section can be very challenging, and VDEM will support and initiate regular HIRA sub-committee meetings each year to lessen the burden for the next plan update.

It was anticipated that the Interim Final Rule of October 31, 2007 would require state and local hazard mitigation plans to address human-caused hazards. The rule did not enforce this requirement; however it allowed the Commonwealth to amend the state plan with a repetitive loss strategy. This strategy makes local governments with SRL properties eligible for a reduced cost share from 25% to 10% to mitigate SRL properties through the SRL and FMA grant programs and was approved on May 30, 2008. A copy of the approval letter can be found in Appendix M.

The COVEOP has several volumes that address human-caused hazards including a Hazardous Materials Response Plan, Radiological Emergency Response Plan, and Terrorism Consequence Management Plan. It wasn't until the late stages of the planning process that the Commonwealth started its Emergency Management Accreditation Program (EMAP) accreditation. The human-caused, technological hazards, and hazardous materials risk matrices from the 2004 plan were updated and re-distributed. These hazards are consistent with the hazards identified at the state EOC. These matrices can be found in Appendix O. As data improves, future revisions of this plan will include a human-caused annex.

A number of the Commonwealth's local governments have already incorporated human caused mitigation planning in their hazard mitigation plans. Hazardous Material Spills are also identified in a number of these 322 plans. It is anticipated that the majority of local hazard mitigation plan revisions will not address human-caused hazards as they are not required under FEMA guidelines.

7.1.3 Plan Maintenance

The State Steering Committee was created to support development of the plan during summer, 2003. While planning committees are generally limited to twenty participants or less, the Commonwealth broadened the committee to include all who participated by attending Steering Committee Meetings, entered projects, provided information and reviewed the plan draft. As described in Chapter 2, for the 2010 update the number of agencies and people on the State Steering



Committee were reduced to only include those agencies with critical roles to mitigation in the Commonwealth. The 150 plus people involved in the 2004 plan was unmanageable so the numbers were reduced to around 60. Also described in Chapters 2, 5, and Appendix J are the four mitigation sub-committees.

- Structural
- Planning
- HIRA
- Outreach and Education

Since the 2004 plan and the 2007 Enhanced plan were approved, only the structural sub-committee has met on a regular basis. The reason for this is due to complete mitigation staff turnover from 2006 through 2007. Essentially the entire steering committee needed to be rebuilt for the 2010 plan revision. The structural sub-committee meets every year to review and rank HMA application before they are submitted to FEMA. For FY2010 HMA grants and on it will be the structural and planning sub-committees reviewing HMA applications due to the high number of mitigation planning applications being received.

VDEM mitigation planning coordinators will be responsible for initiating sub-committee meetings at least twice a year. These meetings can be in person or via video and/or conference calls. The idea is to have each sub-committee review the progress of the mitigation strategies within their designated goal. The result would be to brainstorm and think of ideas for new mitigation strategies for the 2013 update. New strategies for the 2010 update were not discussed until after the HIRA was completed in June of 2009. This process will also involve reviewing mitigation strategies identified in this plan and evaluate their effectiveness for fulfilling the goals and categories.

Having each sub-committee meet each year also allows for new information to be brought forth such as hazard data, new legislation, increased vulnerabilities and success stories. As new success stories and loss avoidance studies are developed, they will be included as appendices to this plan. The continued participation of the sub-committees could also result in discussion of new funding opportunities for state strategies. It is worth noting that only two have participated in HMA funding in the Commonwealth, both after VA DR 1491, Hurricane Isabel. Department of Forestry had an outreach and education campaign due to all of the downed trees, and Department of Conservation and Recreation was awarded funds to do a dam inventory database. It is anticipated that keeping the sub-committee interests between plans will increase the number of agencies interested in participating in the HMA programs.

The planning process timeline will be revised continually during the next three years to ensure that the plan revision can be prepared and submitted to FEMA within the required three-year time period. Special attention will continue to be focused on ensuring that businesses and special interest groups are included and have an input into the plan revision. The planning process will emphasize



including the vulnerability assessment of updated local hazard mitigation plans into future state HIRAs. As described in Chapter 6, local hazard mitigation plan worksheets have been developed and will be used as a pilot for FY2009 planning grants. The idea is to standardize the presentation of data from local hazard mitigation plans so that there is consistency that was not present at the revision of this plan. There are also a couple of strategies in Chapter 5 that outline improving the state facility database by VDEM initiating collaboration between the Department of General Services and the Department of Treasury Risk Management Branch.

Should a specific plan element or section require revision or amendment prior to the subsequent plan revision due to state or federal legislation or policy change, VDEM planning staff will meet with all appropriate stakeholders and propose the change or addendum to FEMA as quickly as is practicable.

Table 6-1 Schedule for Plan Maintenance and Revision

Task	Responsibility	Time Frame
1. Complete update of Standard and Enhanced Hazard Mitigation Plan[Approved March 14, 2007]	VDEM Mitigation Staff FEMA Region III Cooperating Virginia State Agencies	Submit, January 2009
2. Refine Planning Process and timeline for new plan development	VDEM Mitigation Staff 4 Sub-Committees	Ongoing
3. Initiate Sub-Committee Meetings	VDEM Planning Coordinators 4 Sub-Committees	Spring 2010 Fall 2010 Spring 2011 Fall 2011 Spring 2012 Fall 2012
4. Pursue HMA Funding for eligible strategies and projects. Continue to pursue other FEMA funding as available	VDEM Mitigation Staff Project sponsors	Ongoing
5. Secure funding through HMA for the 2013 Plan Revision.	VDEM Mitigation Staff	2010 - 2011
6. Continue working with local plan and state contacts on plan implementation – use VDEM Hazard Mitigation Toolkit, Mitigation Spreadsheets, and Annual Report Form	VDEM Mitigation Staff Local Planning Contacts	Spring 2010 Spring 2011 Spring 2012
7. Evaluate progress on state strategies.	VDEM Mitigation Staff State Agency Contacts 4 Sub-Committees	Summer 2010 Summer 2011 Summer 2012



8. Upload Local Plans	VDEM Mitigation Staff VA Tech CGIT	Fall 2011
9. Hazard Identification and Risk Assessment	VDEM Mitigation Staff VA Tech CGIT HIRA Sub-Committee	Ongoing
10. Develop Mitigation Success Stories	VDEM Mitigation Staff Outreach and Education Sub-Committee	Summer 2010 Summer 2011 Summer 2012
11. Review current regulatory requirements for plan revision	VDEM Mitigation Staff Planning Sub-Committee	Spring 2011
12. Revision of Mitigation Goal, Categories, and Strategies	VDEM Mitigation Staff Steering Committee Members Strategy and Project Sponsors	Summer 2012
13. Draft Review	VDEM Mitigation Staff Steering Committee Members	September - October 2012
14. Submit new Revised All-Hazard Mitigation Plan to FEMA	State Emergency Coordinator	December 1, 2012

7.2 Project Closeout

“Project closeout” is the process that finalizes a completed mitigation project that FEMA has funded. Closeout will be conducted based on FEMA Region III closeout procedures. FEMA-funded projects will continue to be closed out in accordance with national and regional FEMA guidance along with Commonwealth of Virginia VDEM financial management procedures.

Projects and activities funded through other federal or state grant programs, state general funds or that can be achieved without targeted funding will be completed as dictated by the funding source or state program with administrative oversight for the activity of the project. These procedures have been revised, more information on project closeout procedures can be found in Enhanced Appendix 5.

7.2.1 Required Closeout Documents from the Commonwealth with Closeout Request Letter to FEMA:

1. Letter from Governor’s Appointed Representative (GAR) requesting close out. Request indicates project completion and that further cost adjustments will not be required
2. Project Closeout Financial Tracking Report
3. Verification of deed restrictions (for acquisition projects)



4. FEMA Closeout Checklist
5. Any supporting documentation specific to the project

7.2.2 Documents Maintained by the Commonwealth and Sub-grantee for Project Closeout

1. Description of completed project, including AS BUILT designs for structural projects
2. Assurances that post-award requirements identified in Environmental Review Letters were met, if required
3. Budget itemization of expended funds, including local matches
4. Receipts, vouchers and other verification of expenses
5. Duplication of benefit verification (for acquisition projects)
6. Verification of deed restrictions (for acquisition projects)
7. Post-award correspondence
8. Additional pertinent items identified as needed

7.2.3 Close-out Process Guidelines

1. Applicant (Sub-grantee) requests a final project inspection from the Commonwealth (for final payment)
2. Commonwealth performs final inspection and project review (in cooperation with FEMA, who may attend)
3. Final Budget and Scope of Work Adjustment
4. Commonwealth submits closeout letter package to FEMA
5. FEMA reviews closeout package; may request additional information
6. FEMA sends concurrence letter to the Commonwealth for project costs and sub-grantee administrative costs
 - a. Commonwealth and FEMA may resolve any discrepancies in final project costs and sub-grantee administrative costs
 - b. Date of signed concurrence memo is used as a project completion date
 - c. FEMA notifies Commonwealth that project is complete and that no quarterly reports are required

