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Philadelphia, PA 19106-4404



FEMA

April 18, 2024

Caitlin Whiteleather
State Hazard Mitigation Officer
Maryland Department of Emergency Management
5401 Rue Saint Lo Drive
Reisterstown, Maryland 21136

Dear Caitlin Whiteleather:

FEMA has reviewed the Allegany County Hazard Mitigation Plan (HMP), based on standards in Title 44 of the Code of Federal Regulations, Part 201. The items reviewed address the planning process, hazard identification and risk assessment, mitigation strategies, and plan maintenance. The plan received a “satisfactory” rating on all required criteria. It is Approvable Pending Adoption (APA) as of April 18, 2024.

Prior to final approval, each jurisdiction that took part in the Allegany County HMP must send FEMA a resolution of adoption. Also note, each plan participant must adopt within **one year** of the APA date. Plan participants that adopt the plan after one year must validate that their information in the plan remains current. If it is not, they must make the necessary updates before submitting the adoption resolution to FEMA.

I commend you for your continued commitment to reducing future disaster losses. If you have questions, please contact me at (215) 931-5532.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Wolfe".


Sarah Wolfe, Branch Chief
Floodplain Management and Insurance Branch
FEMA Region 3

Enclosure

cc: Jesse Delph, Hazard Mitigation Project Officer, MDEM
Marcia Barben, Hazard Mitigation Project Officer, MDEM
Bridget Cantwell, Hazard Mitigation Specialist, MDEM
Carrie Hughes, Chief, Allegany County Department of Emergency Services

Region 3 Local Mitigation Plan Review Tool Annex: Recommendations for Improvement

Jurisdiction: Allegany County	Title of Plan: Allegany County Hazard Mitigation Plan	Date of Plan: 2023
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 **Element A: Planning Process**

<input type="checkbox"/>	Promote open, equitable, and inclusive public awareness of the hazard mitigation plan. Continue to seek public comment through social mediaonline outreach.
<input type="checkbox"/>	Create and annually disseminate this plan’s Executive Summary to citizens, elected officials, and the media.
<input type="checkbox"/>	<p>Expand the planning team to include a broad range of stakeholders. These can include the following:</p> <ul style="list-style-type: none"> • Watershed organizations. • Business owners. • Regional planning councils. • Conservation districts. • Academia. • Utility providers. • Organization representing underserved community and socially vulnerable populations. <p>They can also include any other partners who can help with mitigation implementation and community outreach.</p>




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<input type="checkbox"/>	Continue to reach out to the local media to increase public knowledge and participation.
<input type="checkbox"/>	Standardize long-term monitoring of hazard-related activities. Add mitigation values to community officials' roles. Keep momentum through engagement during the five-year planning cycle. Share reviews with the state and FEMA for training, funding, and mitigation actions.
<input type="checkbox"/>	Document the annual plan review meetings that should occur over the next five-year planning cycle. You can add sign-in sheets, agendas, meeting minutes, and progress reports to an appendix.
<input type="checkbox"/>	Add the mitigation strategy into current local planning mechanisms; document how this was done. Use the Plan Integration: Linking Local Planning Efforts document to learn how to link local planning mechanisms. You should add the mitigation strategy to the local comprehensive plan. It should inform land use and development.




Element B: Hazard Identification and Risk Assessment

<input type="checkbox"/>	Compare National Flood Insurance Program (NFIP) Insurance Policies in Force with insurable structures in the Special Flood Hazard Area (SFHA). This should be done to analyze flood insurance coverage.
<input type="checkbox"/>	<p>Collect and integrate more detailed jurisdiction-specific asset data for each asset type below into the plan for at least each natural hazard. Ensure that the plan's vulnerability summary of each natural hazard clearly identifies which of the assets below are most vulnerable by jurisdiction.</p> <ul style="list-style-type: none"> • People (including underserved communities and socially vulnerable populations). • Structures (including facilities, lifelines and critical infrastructure). • Systems (including networks and capabilities). • Natural, historic, and cultural resources. • Activities that have value to the community."

<input type="checkbox"/>	<p>Consider using the FEMA Resilience Analysis and Planning Tool (RAPT) to overlay nationally available data layers or import County or State data layers, then integrate a clear image of each map into the plan to help depict the exposure of specific vulnerable assets. The RAPT Resource Center provides a quick guide and tips for using the tool.</p>
<input type="checkbox"/>	<p>Add and document new data you obtain or develop to the next plan update. Mitigation grant applications can use vulnerable structure data (i.e., lowest floor elevation, value, building materials) and similar information. Be sure to document more than one data set (i.e., TEIF vs. Hazus).</p>
<input type="checkbox"/>	<p>Consider using Non-Regulatory Flood Risk Products (NRFRPs). These should help to establish opportunities to speak with local officials. They can help you learn more about specific structures' vulnerabilities within the planning area. They can also point out potential chances for mitigation.</p>
<input type="checkbox"/>	<p>Find gaps or inaccuracies in existing data. These can include natural hazards data, GIS mapping, and research on successful risk reduction methods. Act to fill those gaps. Public agencies are key resources for data and technical information. They include regional planning agencies, geological surveys, forestry divisions, emergency management offices, dam safety agencies, and weather service offices. They can be at the regional, state, and federal government levels. Online resources can also be used for hazard data. The National Climatic Data Center (part of NOAA) is one such resource.</p>
<input type="checkbox"/>	<p>Continue to analyze and account for potential effects of future conditions. These could be changes in population, land use, weather, and natural disaster frequency and severity. Include details about how changing conditions could affect long-term community resilience.</p>
<input type="checkbox"/>	<p>Consider profiling more hazards. These could be based on the state hazard mitigation plan or other identified risks.</p>
	<p>Element C: Mitigation Strategy</p>
<input type="checkbox"/>	<p>Further detail how each community manages the NFIP. Each should comply with the local floodplain ordinance. Each floodplain manager should fill out the NFIP survey / worksheet. The survey will help identify how their communities comply with floodplain requirements and regulations.</p>
<input type="checkbox"/>	<p>Increase community-level interactions and risk-based discussions. Improve descriptions and connections between the outcome of the risk assessment/vulnerability analysis with NRFRPs and the mitigation strategy. Content should flow from problem identification (risk/vulnerability) to mitigation strategy (goals/objectives/actions).</p>

<input type="checkbox"/>	<p>Continue to use the four overarching hazard mitigation techniques. They are:</p> <ul style="list-style-type: none"> • Local Plans and Regulations. • Structure and Infrastructure. • Natural Systems Protection. • Education and Awareness. <p>Make sure the mitigation action plan includes actions that fall under all four groups. This will help you achieve a more robust mitigation strategy.</p>
<input type="checkbox"/>	<p>Further detail why some mitigation actions could not be done. Reasons could relate to funding, staffing, politics, and more. This helps document obstacles to successful implementation.</p>



Element D: Plan Review, Evaluation, and Implementation

<input type="checkbox"/>	<p>Use the Five-Year Planning Wheel. It reflects the regular development, implementation, and enhancement of your hazard mitigation plan.</p>	
<input type="checkbox"/>	<p>Submit annual progress reviews. Plan talks with the state and FEMA.</p>	
<input type="checkbox"/>	<p>Review the Local Mitigation Planning Policy Guide. It will show you programmatic changes since the approval of your plan.</p>	
<input type="checkbox"/>	<p>Reach out to your State Hazard Mitigation Planner 36 months from your plan's expiration date. That way, you can start the scope of work for your next update.</p>	



Seek out an opportunity with the State/FEMA to participate in a Plan Implementation and Grants Development (PIGD) Workshop over the next 5 years.



Additional Comments

<input type="checkbox"/>	<p>To improve the description and analysis of high hazard potential dams (HHPD) related risks, add content to the plan further elaborating on the Potential cascading impacts of storms, seismic events, landslides, wildfires, etc. on dams that might affect upstream and downstream flooding potential. Specifically, elaborate on how natural hazards in addition to storms and flooding (such as soil movement/landslides, earthquakes, and wildfires) effect dam-related flooding.</p>
<input type="checkbox"/>	<p>To improve the description and analysis of high hazard potential dams (HHPD) related risks, consider adding the following to the plan:</p> <ul style="list-style-type: none"> • Documentation summarizing structural integrity issues (such as seepage or erosion) related to specific HHPDs. • Inspection results that describe dam-related deficiencies that could be addressed by specific mitigation actions within the HMP (for instance a mitigation action to develop a dam-related data system, rehabilitate a specific dam, or more). • Condition assessments or reports that speak to dam specific deficiencies such as an undersized dam spillway relative to the dam’s intended design flood.