

## **Appendix I: Policy Guide Checklist**

# Appendix A: Local Mitigation Plan Review Tool

## Cover Page

The Local Mitigation Plan Review Tool (PRT) 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 local governments, including special districts.

1. The Multi-Jurisdictional Summary Sheet is a worksheet that is used to document how each jurisdiction met the requirements of the plan elements (Planning Process; Risk Assessment; Mitigation Strategy; Plan Maintenance; Plan Update; and Plan Adoption).
2. The Plan Review Checklist summarizes FEMA’s evaluation of whether the plan has addressed all requirements.

*For greater clarification of the elements in the Plan Review Checklist, please see Section 4 of this guide. Definitions of the terms and phrases used in the PRT can be found in Appendix E of this guide.*

Plan Information	
Jurisdiction(s)	Roanoke Valley Alleghany Regional Commission
Title of Plan	Roanoke Valley Alleghany Hazard Mitigation Plan
New Plan or Update	Update
Single- or Multi-Jurisdiction	Multi-Jurisdiction
Date of Plan	OCT 2025
Local Point of Contact	
Title	Amanda McGee, Dir. of Community Development
Agency	Roanoke Valley Allegheny Regional Commission
Address	313 Luck Ave SW, Roanoke, VA 24016
Phone Number	540-343-4417
Email	amcgee@rvarc.org

<b>Additional Point of Contact</b>	
<b>Title</b>	
<b>Agency</b>	
<b>Address</b>	
<b>Phone Number</b>	
<b>Email</b>	

<b>Review Information</b>	
<b>State Review</b>	
<b>State Reviewer(s) and Title</b>	Cole Taggart, Planner VDEM Reg. 6
<b>State Review Date</b>	14OCT2025
<b>FEMA Review</b>	
<b>FEMA Reviewer(s) and Title</b>	Annika Tomson, Community Planner
<b>Date Received in FEMA Region</b>	Submission 1: 10/15/2025 Submission 2: 1/9/2026
<b>Plan Not Approved</b>	Submission 1: 11/18/2025
<b>Plan Approvable Pending Adoption</b>	Submission 2: 1/12/2026
<b>Plan Approved</b>	

## Multi-Jurisdictional Summary Sheet

#	Jurisdiction Name	A. Planning Process	B. Risk Assessment	C. Mitigation Strategy	D. Plan Maintenance	E. Plan Update	F. Plan Adoption	G. HHPD Requirements	H. State Requirements
1	Alleghany Co	Y	Y	Y	Y	Y	Y	Y	N/A
2	City of Covington	Y	Y	Y	Y	Y	Y	Y	N/A
3	Town of Clifton Forge	Y	Y	Y	Y	Y	Y	Y	N/A
4	Botetourt Co	Y	Y	Y	Y	Y	Y	Y	N/A
5	Town of Buchanan	Y	Y	Y	Y	Y	Y	Y	N/A
6	Town of Fincastle	Y	Y	Y	Y	Y	Y	Y	N/A
7	Town of Troutville	Y	Y	Y	Y	Y	Y	Y	N/A
8	Craig Co	Y	Y	Y	Y	Y	Y	Y	N/A
9	Roanoke Co	Y	Y	Y	Y	Y	Y	Y	N/A
10	City of Roanoke	Y	Y	Y	Y	Y	Y	Y	N/A
11	City of Salem	Y	Y	Y	Y	Y	Y	Y	N/A
12	Town of Vinton	Y	Y	Y	Y	Y	Y	Y	N/A
13	Roanoke Valley-Alleghany Regional Commission	Y	Y	Y	Y	Y	Y	Y	N/A
14	Roanoke Valley Resource Authority	Y	Y	Y	Y	Y	Y	Y	N/A
15	Western Virginia Water Authority	Y	Y	Y	Y	Y	Y	Y	N/A

## Plan Review Checklist

The Plan Review Checklist is completed by FEMA. States and local governments are encouraged, but not required, to use the PRT as a checklist to ensure all requirements have been met prior to submitting the plan for review and approval. 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.” FEMA completes the “required revisions” summary at the bottom of each element to clearly explain the revisions that are required for plan approval. Required revisions must be explained for each plan sub-element that is “not met.” Sub-elements in each summary should be referenced using the appropriate numbers (A1, B3, etc.), where applicable. Requirements for each element and sub-element are described in detail in Section 4: Local Plan Requirements of this guide.

Plan updates must include information from the current planning process.

If some elements of the plan do not require an update, due to minimal or no changes between updates, the plan must document the reasons for that.

Multi-jurisdictional elements must cover information unique to all participating jurisdictions.

### Element A: Planning Process

Element A Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>A1. Does the plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction? (Requirement 44 CFR § 201.6(c)(1))</b>		
A1-a. Does the plan document how the plan was prepared, including the schedule or time frame and activities that made up the plan’s development, as well as who was involved?	Chapter 1, pages 2-5; Appendix A; Appendix G.	Met
A1-b. Does the plan list the jurisdiction(s) participating in the plan that seek approval, and describe how they participated in the planning process?	Chapter 1, pages 1 and 3, Appendix A, Appendix G	Met
<b>A2. Does the plan document an opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development as well as businesses, academia, and other private and non-profit interests to be involved in the planning process? (Requirement 44 CFR § 201.6(b)(2))</b>		
A2-a. Does the plan identify all stakeholders involved or given an opportunity to be involved in the planning process, and how each stakeholder was presented with this opportunity?	Chapter 1, page 4; Appendix A; Appendix B	Met

Element A Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>A3. Does the plan document how the public was involved in the planning process during the drafting stage and prior to plan approval? (Requirement 44 CFR § 201.6(b)(1))</b>		
A3-a. Does the plan document how the public was given the opportunity to be involved in the planning process and how their feedback was included in the plan?	Chapter 1, page 5; Appendix A; Appendix B	Met
<b>A4. Does the plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement 44 CFR § 201.6(b)(3))</b>		
A4-a. Does the plan document what existing plans, studies, reports and technical information were reviewed for the development of the plan, as well as how they were incorporated into the document?	Chapter 2, pages 6-8, 13; Chapter 3, pages 31-32; Chapter 5, pages 3-41	Met
<b>Element A Required Revisions</b>		
<p><b>Kudos:</b></p> <p>Public and stakeholder engagement was very strong, both surveys were structured to capture a range of hazard mitigation and emergency management information. Particularly liked the stakeholder question asking for suggestions for outreach methods. There was also consistent engagement of the steering committee. Commend the planning team for the range of engagement opportunities offered and the identification of opportunities for improvement. There's clear documentation that is easy to understand without losing clarity on who participated when. Nicely done!</p> <p><b>A1-b Required Revision:</b></p> <p>Please add the title of the steering committee members.</p> <p><b>Titles have been added to Table 1, page 1-3 and 1-4.</b></p> <p><b>FEMA: Addressed</b></p> <p>Plan participants need to participate twice in the planning process to meet this requirement. This can be done through meetings, survey responses, or other methods. The Town of Clifton Forge submitted a Capability Assessment, but there is no documentation of other participation. If there is additional documentation that demonstrates their participation in the planning process please add it to the Appendix: worksheets, one off meetings, email exchanges where substantial feedback or information was shared, etc. If material like this is not available, please work with the town to complete the worksheet, hold a meeting to discuss the plan, etc., so that they can participate in the plan.</p> <p><b>The Town of Clifton Forge submitted a Capability Assessment and participated in the project review meeting, information updated in Appendix A (page 6).</b></p> <p><b>FEMA: Addressed</b></p> <p><b>A4-a Recommended:</b> Consolidate a complete list of the existing plans, studies, reports and technical information were reviewed for the development of the plan in either an appendix or elsewhere in the plan narrative. This list can then be easily reviewed during the next plan update and additions made.</p>		

## Element B: Risk Assessment

Element B Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>B1. Does the plan include a description of the type, location, and extent of all natural hazards that can affect the jurisdiction? Does the plan also include information on previous occurrences of hazard events and on the probability of future hazard events? (Requirement 44 CFR § 201.6(c)(2)(i))</b>		
B1-a. Does the plan describe all natural hazards that can affect the jurisdiction(s) in the planning area, and does it provide the rationale if omitting any natural hazards that are commonly recognized to affect the jurisdiction(s) in the planning area?	Chapter 3, pages 1-55 (historical event descriptions); Chapter 4, pages 6-40 (probability) ; Appendix C (flood hazard areas) ; Appendix D (Flooding HAZUS) ; Appendix E (Wildfire Reports); Appendix H (Dam information)	Met
B1-b. Does the plan include information on the location of each identified hazard?	Chapter 3, pages 1-55; Appendix C (flood hazard areas), Appendix E (Wildfire Reports), Appendix H (Dam information); Chapter 4, page 26-27	Met
B1-c. Does the plan describe the extent for each identified hazard?	Chapter 3 pages 6-12, 42, 46, 49, 51; Chapter 4 8, 13, 26-27, 30, 41	Met
B1-d. Does the plan include the history of previous hazard events for each identified hazard?	Chapter 3, pages 7-54 Appendix E (Wildfire Reports)	Met

Element B Requirements	Location in Plan (section and/or page number)	Met / Not Met
B1-e. Does the plan include the probability of future events for each identified hazard, including the type, location and range of anticipated intensities?	Chapter 4, all pages.	Met
B1-f. For participating jurisdictions in a multi-jurisdictional plan, does the plan describe any hazards that are unique to and/or vary from those affecting the overall planning area?	Chapter 4, pages 1-4 (and entire chapter)	Met
<b>B2. Does the plan include a summary of the jurisdiction’s vulnerability and the impacts on the community from the identified hazards? Does this summary also address NFIP-insured structures that have been repetitively damaged by floods? (Requirement 44 CFR § 201.6(c)(2)(ii))</b>		
B2-a. Does the plan provide an overall summary of each jurisdiction’s vulnerability to the identified hazards?	Chapter 4, Local Vulnerability sections (pages 9, 14, 19-21, 27-28, 33-34, 37, 41)	Met
B2-b. For each participating jurisdiction, does the plan describe the potential impacts of each of the identified hazards on each participating jurisdiction?	Chapter 4, Projected Costs sections (pages 2, 6, 12, 17, 24, 32, 36, 39)	Met
B2-c. Does the plan address NFIP-insured structures within each jurisdiction that have been repetitively damaged by floods?	Chapter 4, pages 20-21; Chapter 5 pages 4-5, 7, 9, 11, 13-15, 17, 19-20, 25, 30, 33; Appendix C (Flood hazard areas)	Met
<b>Element B Required Revisions</b>		
<p><b>Kudos:</b> Really excellent narrative of past flooding events and impacts</p> <p><b>B1-b Recommended Revision:</b> Recommend highlighting planning area in state and region wide maps (e.g. pg. 3-7, 41)</p> <p>Recommend changing Fig. 27 to a state or regional level map as it is very difficult to see the location of the sinkhole hotspots in the planning area.</p> <p><b>B1-c. Required Revision:</b></p> <p>Please add the Saffir-Simpson Scale to the Hurricane &amp; Tropical Storm section in Chapter 3</p> <p><b>Added, Section 3.5, page 3-41.</b></p> <p><b>FEMA:</b> Addressed</p>		

**B1-e Note:**

The 2025 Local HMP Policy Guide updated the language for this requirement. Language from the updated 2025 PRT has been swapped in.

**B1-f Recommended:** Strongly recommend stating clearly if any of the hazards do not impact the special districts participating in the plan. Otherwise, the special districts will need to be included in all the revisions for B2-a, instead of just for the specific hazards that impact them

Considerations for Special Districts added to section 4.1. Special districts added to all hazard ranking table (Table 17). Pages 4-4 and 4-5. Project added to improve risk assessment for special districts in correlation with those entities in future plan updates. (Page 7-63).

**B2-a Required Revision:**

“The risk assessment must describe the vulnerability of plan participant(s) to each identified hazard. The vulnerability description must include a summary (such as a problem statement) of the hazard and its consequences or effects on the participant(s) and their assets. A list of assets without context is not sufficient

Vulnerability is a description of which assets, including structures, systems, populations and other assets as defined by the community, within locations identified to be hazard prone, are at risk from the effects of the identified hazard(s)

Assets are determined by the community and include, but are not limited to:

- **People.**
- **Structures** (including facilities, lifelines and critical infrastructure).
- **Systems** (including **networks and capabilities**).
- **Natural, historic, and cultural** resources.
- **Activities that have value to the community.”**

(2025 Local Mitigation Planning Policy Guide, page 26).

The plan identifies and describes the assets of the Roanoke Valley-Alleghany Region in the community profile. However, except for Flooding, the vulnerability analysis section of the plan does not explicitly state how these assets are at risk to each hazard by jurisdiction. This asset-level assessment does not need to be comprehensive of all potentially vulnerable assets but should include a particular asset type broken out by jurisdiction (e.g. vulnerable populations like children and the elderly or a system that impacts multiple jurisdictions like a major hospital) Please include greater asset vulnerability information for Extreme Temperatures, Geologic Hazards, Wildfire, Wind, and Winter Storm, further details and suggestions are below. Asset information can be referenced from other sections of the plan (e.g. population information in community profile) or collected from existing tools like [FEMA's Resilience Analysis and Planning Tool](#) (RAPT). If there is an information gap, please create a mitigation action aimed at filling it.

Considerations for Special Districts added to section 4.1. Special districts added to all hazard ranking table (Table 17). Pages 4-4 and 4-5. Special districts added to each individual hazard ranking table for each hazard/section.

**FEMA: Addressed**

*Extreme Temperatures:* The NRI vulnerability information provided doesn't meet this requirement. Recommend including further information on vulnerable people (e.g. people <5/>65, populations

without a car, non-English speakers, etc.). and the facilities that support them (e.g. schools, nursing homes, etc.)

Projected Local Vulnerability amended to add vulnerable populations information and heating source for homes information (Tables 25 and 26). Text added to explain vulnerability and impacts. 4-15 through 4-17. Hazard Ranking table updated using the information provided.

**FEMA:** Addressed

*Geologic Hazards:* The vulnerability information provided doesn't meet this requirement. Recommend discussion critical facilities that are in sinkhole hotspots and/or high slope areas.

Text regarding the work with Virginia Department of Energy added (p. 4-26). Map of critical and vulnerable facilities against the USGS Landslide Susceptibility Model conducted (Figure 27, 28) and Table extracted (Table 35/36). Data incorporated into the amended Hazard Ranking Table for this hazard. Pages 4-29 through 4-34.

**FEMA:** Addressed

*Wildfire:* Appendix E is one of the informational strengths of this plan and provides a great deal of information on wildfire risk in the planning area, but it the Plan does not bridge this information into jurisdictional asset vulnerability for all the participants. One option would be to fully break out the Housing Unit Risk on pg. 26 of App. E at the jurisdictional level. Another option could be to overlap critical facilities and Burn Probability App. E pg. 12. Could also update the information from 2019 plan on Woodland Home Community Fire Risk.

Text in Project Local Vulnerability for this hazard amended to more fully explain the wildfire model (Table 41). Page 4-38.

**FEMA:** Addressed

*Wind:* Recommend adding information on mobile home & RV park locations or information on critical facilities that lack generators.

Created Table 45: Mobile and Manufactured Homes, and incorporated information into Local Vulnerability Score. Text amendments to interpret data. Pages 4-42 through 4-43. Project added to inventory mobile home and RV park locations in the region (page 7-64). Project added to identify critical and vulnerable facilities that lack generators at recommendation of FEMA (page 7-64).

**FEMA:** Addressed

*Winter Storm:* Recommend including further information on vulnerable people (e.g. people <5/>65, populations without a car, non-English speakers, etc.). and the facilities that support them (e.g. schools, nursing homes, etc.).

Explanation of the correlation between road mileage and vulnerability/burden on community of winter storm events. Page 4-47. Project added to identify critical and vulnerable facilities that lack generators at recommendation of FEMA (page 7-64).

**FEMA:** Addressed

**B2-a Recommended Revisions:**

*Earthquake:* If possible, add information on critical facilities located in structures built before 1970

**State Recommended Revision:** Recommend expanding the vulnerability section for wind, or consider that a project for the plan

**B2-c Required Revision:**

This requirement is partially addressed for the participating cities and counties. Please state in the plan if the participating towns do not have any repetitive loss properties. However, based on the maps in Appendix C, there are repetitive loss properties in the towns of Clifton Forge, Buchanan, and Vinton. Therefore, the estimated numbers and types (residential, commercial, institutional, etc.) of repetitive/severe repetitive loss properties for those towns need to be included in the plan. If this information cannot be included, please explain this data gap and create a mitigation action to address it.

Repetitive loss statistics are only available at the County level from existing databases. More nuanced repetitive loss information is possible – however, updated mapping information from FEMA has not been received. Emails were sent regarding repetitive loss data at the end of September applying for access to that information. No response was received as of this review. This is further detailed in Appendix C Flood Hazard Areas. A mitigation action to attain accurate Repetitive Loss data is included in multiple tables in Chapter 7.

**FEMA:** Addressed

## Element C: Mitigation Strategy

Element C Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>C1. Does the plan document each participant’s existing authorities, policies, programs and resources and its ability to expand on and improve these existing policies and programs? (Requirement 44 CFR § 201.6(c)(3))</b>		
C1-a. Does the plan describe how the existing capabilities of each participant are available to support the mitigation strategy? Does this include a discussion of the existing building codes and land use and development ordinances or regulations?	Chapter 5, all pages	Met
C1-b. Does the plan describe each participant’s ability to expand and improve the identified capabilities to achieve mitigation?	Chapter 5, all pages	Met
<b>C2. Does the plan address each jurisdiction’s participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement 44 CFR § 201.6(c)(3)(ii))</b>		
C2-a. Does the plan contain a narrative description or a table/list of their participation activities?	Chapter 5, all pages; Chapter 7, all pages; Appendix G: NFIP Worksheets	Met
<b>C3. Does the plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement 44 CFR § 201.6(c)(3)(i))</b>		
C3-a. Does the plan include goals to reduce the risk from the hazards identified in the plan?	Chapter 6, page 1	Met
<b>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 44 CFR § 201.6(c)(3)(ii))</b>		
C4-a. Does the plan include an analysis of a comprehensive range of actions/projects that each jurisdiction considered to reduce the impacts of hazards identified in the risk assessment?	Chapter 6, pages 2-8	Met
C4-b. Does the plan include one or more action(s) per jurisdiction for each of the hazards as identified within the plan’s risk assessment?	Chapter 7, all pages	Met
<b>C5. Does the plan contain an action plan that describes how the actions identified will be prioritized (including a cost-benefit review), implemented, and administered by each jurisdiction? (Requirement 44 CFR § 201.6(c)(3)(iv)); (Requirement §201.6(c)(3)(iii))</b>		
C5-a. Does the plan describe the criteria used for prioritizing actions?	Chapter 7, page 1	Met

Element C Requirements	Location in Plan (section and/or page number)	Met / Not Met
C5-b. Does the plan provide the position, office, department or agency responsible for implementing/administrating the identified mitigation actions, as well as potential funding sources and expected time frame?	Chapter 7, all pages	Met
<b>Element C Required Revisions</b>		
<p><b>Kudos:</b> The Capability Assessment chapter is very well done, clear and consistent information provided for each participant.</p> <p><b>C2-a Required Revision:</b> Please include the latest Flood Insurance Rate Map (FIRM) effective date for all participants that intersect with the SFHA. FIRMs can be searched for here: <a href="https://msc.fema.gov/portal/advanceSearch">https://msc.fema.gov/portal/advanceSearch</a> <b>Done, FIRM effective date added for all localities. Highlighted, throughout Chapter 5.</b> <b>FEMA: Addressed</b></p> <p>Please include information on the floodplain administrator or designee position (e.g. Town Manager) for: Town of Buchanan, Town of Clifton Forge, Town of Fincastle, Town of Troutville. Information can be found here: <a href="https://www.dcr.virginia.gov/dam-safety-and-floodplains/floodplain-directory">https://www.dcr.virginia.gov/dam-safety-and-floodplains/floodplain-directory</a> <b>Added information on the position for each – turnover means that individual names listed in the plan may quickly become obsolete. Highlighted, throughout Chapter 5.</b> <b>FEMA: Addressed</b></p> <p>There is information on some participants’ administrator of Substantial Damage/Substantial Improvement. To fully meet this requirement, add a mitigation action to bring FEMA’s Substantial Damage/Substantial Improvement training to the planning area. <b>Project added to RVARC list, page 7-64.</b> <b>FEMA: Addressed</b></p> <p><b>C4-b Recommended:</b> Recommend reorganizing the mitigation actions for each community so that the completed actions are clearly marked and sectioned together. <b>Status column has been added and projects are filtered by status (Chapter 7).</b> <b>FEMA: Addressed</b></p> <p><b>C5-b Required Revision:</b> Please add timelines for all the mitigation actions. “Pending on funding” and “TBD” are not sufficient. The added timelines should be defined with a specific year or date, e.g. 2030 or 5 years. <b>Projected timeline definitions added on page 1 of Chapter 7, timelines added for all projects throughout Chapter 7.</b> <b>FEMA: Addressed</b></p>		

## Element D: Plan Maintenance

Element D Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>D1. Is there discussion of how each community will continue public participation in the plan maintenance process? (Requirement 44 CFR § 201.6(c)(4)(iii))</b>		
D1-a. Does the plan describe how communities will continue to seek future public participation after the plan has been approved?	Chapter 1, page 7	Met
<b>D2. Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a five-year cycle)? (Requirement 44 CFR § 201.6(c)(4)(i))</b>		
D2-a. Does the plan describe the process that will be followed to track the progress/status of the mitigation actions identified within the Mitigation Strategy, along with when this process will occur and who will be responsible for the process?	Chapter 1, page 7-8	Met
D2-b. Does the plan describe the process that will be followed to evaluate the plan for effectiveness? This process must identify the criteria that will be used to evaluate the information in the plan, along with when this process will occur and who will be responsible.	Chapter 1, pages 7-8	Met
D2-c. Does the plan describe the process that will be followed to update the plan, along with when this process will occur and who will be responsible for the process?	Chapter 1, pages 7-8	Met

Element D Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>D3. Does the plan describe a process by which each community will integrate the requirements of the mitigation plan into other planning mechanisms, such as comprehensive or capital improvement plans, when appropriate? (Requirement 44 CFR § 201.6(c)(4)(ii))</b>		
D3-a. Does the plan describe the process the community will follow to integrate the ideas, information and strategy of the mitigation plan into other planning mechanisms?	Chapter 1, pages 7-8; Chapter 5	Met
D3-b. Does the plan identify the planning mechanisms for each plan participant into which the ideas, information and strategy from the mitigation plan may be integrated?	Chapter 5	Met
D3-c. For multi-jurisdictional plans, does the plan describe each participant's individual process for integrating information from the mitigation strategy into their identified planning mechanisms?	Chapter 5	Met
<b>Element D Required Revisions</b>		
<p><b>D1-a Recommended Revision:</b> Recommend including more information on how the public will be engaged during plan maintenance. The plan may contain a narrative description or an itemized list of steps, demonstrating the prescribed method that will be followed to obtain future public participation. Special consideration should be given to identifying and using unique and meaningful ways to keep the public engaged in the process. Examples include but are not limited to: periodic presentations on the plan’s progress to elected officials, schools or other community groups; annual questionnaires or surveys; public meetings; postings on social media; and interactive websites.</p> <p><b>D2-b Required Revision:</b> Please provide more information on how, when and by whom the plan will be assessed for effectiveness at achieving its stated purpose and goals. The evaluation method may be described by including a narrative description or an itemized list of steps demonstrating the prescribed method that will be followed to evaluate the plan after plan approval and during the plan's implementation, and prior to the plan's update</p> <p><b>Text describing this updated in section 1.4. (Page 1-8)</b></p> <p><b>FEMA: Addressed</b></p> <p><b>D2-c Required Revision:</b> Please provide more information on how, when and by whom the plan will be reviewed and revised at least once every five years. The update method may be described by including a narrative description or an itemized list of steps that will be followed to update the plan prior to resubmission for approval and during the plan's implementation. The plan seems to imply that the Regional Commission will be responsible, if this is the case, please state that clearly.</p> <p><b>Text describing this updated in section 1.4. (Page 1-8)</b></p> <p><b>FEMA: Addressed</b></p>		

## Element E: Plan Update

Element E Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>E1. Was the plan revised to reflect changes in development? (Requirement 44 CFR § 201.6(d)(3))</b>		
E1-a. Does the plan describe the changes in development that have occurred in hazard-prone areas that have increased or decreased each community's vulnerability since the previous plan was approved?	Chapter 2, pages 4-9	Met
<b>E2. Was the plan revised to reflect changes in priorities and progress in local mitigation efforts? (Requirement 44 CFR § 201.6(d)(3))</b>		
E2-a. Does the plan describe how it was revised due to changes in community priorities?	Chapter 1, page 2	Met
E2-b. Does the plan include a status update for all mitigation actions identified in the previous mitigation plan?	Chapter 5, mitigation actions sections (pages 20-21, 25-26) ; Chapter 7 all pages	Met

Element E Requirements	Location in Plan (section and/or page number)	Met / Not Met
E2-c. Does the plan describe how jurisdictions integrated the mitigation plan, when appropriate, into other planning mechanisms?	Chapter 5, Plans and Planning Schedules sections	Met
<b>Element E Required Revisions</b>		
<p><b>E2-b Required Revision:</b> Please provide greater clarity on the status of actions from the previous plan. Reading the mitigation strategy, there are updates for completed projects, but it is unclear what the status is of the non-completed projects. Recommended adding a column “Carried over from previous plan (Y/N)”.</p> <p>Column indicating date added to plan added to all mitigation tables. Status definitions included on page 1 of Chapter 7. Status provided for all mitigation actions.</p> <p>FEMA: Addressed</p>		

## Element F: Plan Adoption

Element F Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>F1. For single-jurisdictional plans, has the governing body of the jurisdiction formally adopted the plan to be eligible for certain FEMA assistance? (Requirement 44 CFR § 201.6(c)(5))</b>		
F1-a. Does the participant include documentation of adoption?		
<b>F2. For multi-jurisdictional plans, has the governing body of each jurisdiction officially adopted the plan to be eligible for certain FEMA assistance? (Requirement 44 CFR § 201.6(c)(5))</b>		
F2-a. Did each participant adopt the plan and provide documentation of that adoption?	To be added in Appendix J.	
<b>Element F Required Revisions</b>		
<b>Required Revision:</b>		

## Element G: High Hazard Potential Dams (Optional)

HHPD Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>HHPD1. Did the plan describe the incorporation of existing plans, studies, reports and technical information for HHPDs?</b>		
HHPD1-a. Does the plan describe how the local government worked with local dam owners and/or the state dam safety agency?	Chapter 5, Dam Safety Sections; Chapter 3, 32-35	Met
HHPD1-b. Does the plan incorporate information shared by the state and/or local dam owners?	Chapter 5, Dam Safety sections; Appendix H (Dam supplement)	Met
<b>HHPD2. Did the plan address HHPDs in the risk assessment?</b>		
HHPD2-a. Does the plan describe the risks and vulnerabilities to and from HHPDs?	Chapter 3, pages 32-38; Chapter 4 page 5; Appendix H (Dam supplement)	Met
HHPD2-b. Does the plan document the limitations and describe how to address deficiencies?	Chapter 3, pages 32-38; Chapter 4 page 5; Appendix H (Dam supplement)	Met
<b>HHPD3. Did the plan include mitigation goals to reduce long-term vulnerabilities from HHPDs?</b>		
HHPD3-a. Does the plan address how to reduce vulnerabilities to and from HHPDs as part of its own goals or with other long-term strategies?	Chapter 3, pages 32-38; Chapter 4 page 5; Appendix H (Dam supplement)	Met
HHPD3-b. Does the plan link proposed actions to reducing long-term vulnerabilities that are consistent with its goals?	Chapter 3, pages 32-38; Chapter 4 page 5; Appendix H (Dam supplement)	Met
<b>HHPD4-a. Did the plan include actions that address HHPDs and prioritize mitigation actions to reduce vulnerabilities from HHPDs?</b>		
HHPD4-a. Does the plan describe specific actions to address HHPDs?	Chapter 3, pages 32-38; Chapter 4 page 5; Appendix H (Dam supplement) ; Chapter 7	Met
HHPD4-b. Does the plan describe the criteria used to prioritize actions related to HHPDs?	Chapter 3, pages 32-38; Chapter 4 page 5; Appendix H (Dam supplement)	Met

<p>HHPD4-c. Does the plan identify the position, office, department or agency responsible for implementing and administering the action to mitigate hazards to or from HHPDs?</p>	<p>Chapter 3, pages 32-38; Chapter 4 page 5; Chapter 5, Dam Safety sections ; Appendix H (Dam supplement)</p>	<p>Met</p>
<p><b>HHPD Required Revisions</b></p>		
<p><b>Required Revision:</b></p> <p><b>HHPD1-a Required Revision:</b> Please specify the outreach that was conducted to contact local dam owners beyond WVWA. If no response was received, please state this.</p> <p>Description of outreach included in section 3.4, page 3-34. DCR and local governments are primarily responsible for outreach to dam owners under state code. The role of the state is further outlined on page 3-37.</p> <p>FEMA: Addressed</p> <p><b>HHPD2-a Required Revision:</b></p> <p>There is a solid discussion of the potential cascading impacts from other hazards on dams and information on the location and size of populations at risk, as well as potential impacts to institutions from some HHPDs in the planning area, namely Clifton Forge Dam, Carvin Cove Dam, Johns Creek Dams #1-#4, Darr Dam, and Windsor Lake Dam.</p> <p>To fully meet this requirement, add a discussion of the potential significant economic, environmental or social impacts from dam failure; <u>and</u> add at least baseline estimated information for each HHPD not listed above describing the “location and size of populations at risk from HHPDs, as well as potential impacts to institutions and critical infrastructure/facilities/lifelines.” Ideally, summarize this information using a table and maps.</p> <p>Consider using <a href="#">DSS-WISE</a> or FEMA’s <a href="#">Resilience Analysis and Planning Tool (RAPT)</a> to help estimate and describe the location and size of the population at risk and any critical facilities/lifelines that are located around each Westmoreland County HHPD.</p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>• The “Population Counter” button in the RAPT can be used to select specific HHPDs and quickly estimate the population (number of persons) nearby by drawing a 2-D shape around a specific HHPD then selecting “run.”</li> <li>• Similarly, the “Incident Analysis” button in the RAPT can be used to set a point on an HHPD or draw a polygon around an HHPD, specify a buffer distance (such as 5 or 10 miles), then quickly view the number and location of specific critical infrastructure/lifeline assets within the buffer zone specified.</li> <li>• USACE National Inventory of Dams (NID) data can be quickly added to the RAPT by selecting the “Add Data” button and searching for “National Inventory of Dams.”</li> </ul> <p>RAPT Scenarios were run for any dam which did not have an inundation map. Dam Safety Data sheets were added for all dams. All data is available in Appendix H.</p> <p>FEMA: Addressed</p> <p><b>HHPD4-a Required Revision:</b></p> <p>To meet this requirement, please provide a more robust range of mitigation actions related to HHPDs,</p>		

in particular planning and design activities. (Currently only two actions directly tied to HHPDs on 7-22 and 7-48)

- **Planning activities** such as:
  - Activities and studies that determine risks associated with eligible dams
  - Environmental studies for NEPA compliance
  - Development of operation and maintenance plans
  - Public education and awareness of flood risks associated with the eligible dam project
  - Dam risk and consequence assessments Feasibility studies
  - Preliminary engineering studies Alternatives analysis
  - Mapping, engineering survey, and inundation modeling
  - Development of evacuation plans, plans for flood fighting, or community response plans to include in the floodplain management plan
  - Coordination of EAP and EOPs for different release conditions
- **Design activities** such as:
  - Engineering design
  - Development of specifications

Information regarding the role of the state is included on page 3-37.

“The following powers are within the province of DCR:

- Activities and studies that determine risks associated with eligible dams
- Environmental studies for NEPA compliance
- Development of operation and maintenance plans
- Dam risk and consequence assessments Feasibility studies
- Preliminary engineering studies Alternatives analysis
- Mapping, engineering survey, and inundation modeling
- Coordination of EAP and EOPs for different release conditions
- Engineering design
- Development of specifications

DCR coordinates these activities directly with the dam owner, and the local government is generally informed of many of these plans and elements after the fact unless they also fill the role of dam owner. While the local government may coordinate on safety elements such as public communication or evacuation plans, most of the mitigation actions possible for high hazard potential dams are the responsibility of the dam owner or the state.”

HHPD dam mitigation actions are appropriately included by signatory dam owners and partners. Specific projects outlined in this plan include WVWA Studies of Dams with the goal of establishing a replacement program (7-68), Safety Improvements on four dams in Craig County (7-33), and a Local Flood Profile identified by Clifton Forge (7-12). These are immediate needs, but other actions may be identified in future project updates.

**FEMA:** Addressed

**HHPD 4-c Required Revision:** Please ensure that all HHPD actions have clear timelines. “Pending on funding” and “TBD” are not sufficient. The added timelines should be defined with a specific year or date, e.g. 2030 or 5 years.

Projected timeline definitions added on page 1 of Chapter 7, timelines added for all projects throughout Chapter 7.

**FEMA:** Addressed

## Element H: Additional State Requirements (Optional)

Element H Requirements	Location in Plan (section and/or page number)	Met / Not Met
This space is for the State to include additional requirements		