



FEMA

MAR 10 2015

Mr. Steve Ferryman
Mitigation and Recovery Branch Chief
Ohio Emergency Management Agency
2855 W. Dublin-Granville Road
Columbus, Ohio 43235-2206

Dear Mr. Ferryman:

Thank you for submitting the Lorain County Hazard Mitigation Plan update for our review. The plan was reviewed based on the local plan criteria contained in 44 CFR Part 201, as authorized by the Disaster Mitigation Act of 2000. Lorain County met the required criteria for a multi-jurisdiction hazard mitigation plan. Formal approval of this plan is contingent upon the adoption of the current version of the plan by the county. Once FEMA Region V receives documentation of adoption we will send a letter of official approval to your office.

We look forward to receiving the adoption documentation and completing the approval process for the Lorain County plan.

If you or the community has any questions, please contact Rebecca Leitschuh at (312) 408-4421 or at rebecca.leitschuh@fema.dhs.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "E.N.K. Stack".

Christine Stack, Director
Mitigation Division

Attachments: Local Plan Review Sheets



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CONCURRENCE			
<i>MM</i> 3/10/15	<i>FWK</i> 3/10/15		

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APPENDIX A: LOCAL MITIGATION PLAN REVIEW TOOL

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 Regulation Checklist provides a summary of FEMA's evaluation of whether the Plan has addressed all requirements.
- The Plan Assessment identifies the plan's strengths as well as documents areas for future improvement.
- The Multi-jurisdiction Summary Sheet is an optional worksheet that can be used to document how each jurisdiction met the requirements of the each Element of the Plan (Planning Process; Hazard Identification and Risk Assessment; Mitigation Strategy; Plan Review, Evaluation, and Implementation; and Plan Adoption).

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

Jurisdiction: Lorain County, Ohio	Title of Plan: Lorain County Ohio Multi-Jurisdictional Natural Hazard Mitigation Plan 2014	Date of Plan: February 9, 2015
Local Point of Contact: Mr. Tom Kelley	Address: 322 North Gateway Blvd. Lorain, Ohio 44035	
Title: Director		
Agency: Lorain County Emergency Management Agency		
Phone Number: 419.329.5117	E-Mail: tkelley@loraincounty.us	

State Reviewer: Dean W. Ervin, Sr.	Title: State Mitigation Planner	Date: February 10, 2015
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FEMA Reviewer: Rebecca Leitschuh	Title: Community Planning Specialist	Date: 2/27/2015
Date Received in FEMA Region (insert #)	2/11/2015	
Plan Not Approved		
Plan Approvable Pending Adoption	3/9/2015	
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))	Sect. 2, pp. 2-1 to 2-10; Appx. C; Appendix E describe the planning process. Appendix C lists the participating jurisdictions, the representatives, and describes their involvement in the planning and meeting process.		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))	Sect. 2, pp. 2-1 to 2-10; Appendix C; Appendix E		X	
A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))	Sect. 2, 2-10 to 2-11 Appendix E		X	
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))	Sect. 2, p. 2-8 to 2-9		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))	Sect. 3, p. 3-3		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))	Sect. 3, pp. 3-2 to 3-3; Sect. 5, p. 6-52		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				
There are no required revisions for this Element.				
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))	Sect. 5, pp. 5-1 to 5-41 Appendix A	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))	Sect. 5, pp. 5-8 to 5-41	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))	Sect. 5, pp. 5-32 to 5-41 and 5-46 to 5-63 Appendix D	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))	Sect. 5, p. 5-45 to 5-46	X		
ELEMENT B: REQUIRED REVISIONS				
There are no required revisions for this Element.				
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))	Sect. 2, p. 2-8 Sect. 4, pp. 4-17 to 4-18	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))	Sect. 5, p. 5-42 to 5-43	X		
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))	Sect. 6, pp. 6-13 to 6-37	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))	Sect. 6, pp. 6-13 to 6-51	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))	Prioritization Sect. 6, p. 6-48; implementation, funding and timeframes pp. 6-34 to 6-47	X		

1. REGULATION CHECKLIST		Location in Plan	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)		(section and/or		
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))	Sect. 3, p. 3-3		X	
<u>ELEMENT C: REQUIRED REVISIONS</u>				
There are no required revisions for this Element.				
<u>ELEMENT D. PLAN REVIEW, EVALUATION, AND IMPLEMENTATION</u> (applicable to plan updates only)				
D1. Was the plan revised to reflect changes in development? (Requirement §201.6(d)(3))	Sect. 4, pp. 4-1, pp. 4-24 to 4-27		X	
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))	Sect. 6, pp. 6-2 to 6-10		X	
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))	Sect. 6, pp. 6-10 to 6-12		X	
<u>ELEMENT D: REQUIRED REVISIONS</u>				
There are no required revisions for this Element.				
<u>ELEMENT E. PLAN ADOPTION</u>				
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))	(pending); Sect. 2, p. 2-10			
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))	(pending); Sect. 2, p. 2-10			
<u>ELEMENT E: REQUIRED REVISIONS</u>				
There are no required revisions for this Element.				
<u>ELEMENT F. ADDITIONAL STATE REQUIREMENTS (OPTIONAL FOR STATE REVIEWERS ONLY; NOT TO BE COMPLETED BY FEMA)</u>				
F1. There are no additional state requirements.				
F2.				
<u>ELEMENT F: REQUIRED REVISIONS</u>				

SECTION 2: PLAN ASSESSMENT

Element A: Planning Process

Plan strengths:

- The plan states that community participation may be limited, and in anticipation the EMA and consultant planned ahead to offer evening meetings if necessary and to conduct repeat sessions. (2-3 to 2-4)
- Aggressive meeting schedule with communities and local officials. (2-8)
- The plan acknowledges that the county had a period of a few years when the previous plan lapsed. To provide opportunities for regular review and update, the plan states that the county "...established corrective actions that will ensure the problem does not reoccur." (3-1)

Opportunities for Improvement

- While the narrative portions are well written, it would be beneficial to break up the sections for the reader by utilizing more lists, bullets, pictures, maps, etc. The analysis is thorough throughout the entire plan, but more graphics could summarize some of the sections more quickly. And supporting pictures and diagrams of historical events further emphasize the importance of mitigation planning and risk reduction.

Element B: Hazard Identification and Risk Assessment

Plan strengths:

- The plan describes local vulnerabilities within separate, dedicated sections for each participating jurisdiction, providing a high level of detail and awareness. (Section 5)
- The section on vulnerabilities includes socially vulnerable populations, building code and land use enforcement concerns, agricultural tiling, new development, antiquated sewer lines, etc. (Section 5)

Opportunities for Improvement

- HAZUS produced tables are useful, however for the benefit of residents or community officials reading the plan, a suggestion is to provide a summary of results with the most significant risks/vulnerabilities in need of attention in the main body of the plan. Include the HAZUS initiated tables of information in appendices. The risk analysis is full of good information, but the format is not easily accessible to the average reader needing an overall understanding of the most important issues. (Section 5)
- The floodplain maps are very difficult to read. Communities are not identified on the maps. The scale does not adequately display the risk. The variations between Zone A and Zone AE are not clear. (Appendix)

Element C: Mitigation Strategy

Plan strengths:

- "Ongoing" is usually too broad of a description when showing the progress of mitigation strategies. However, the table includes supplemental descriptions as a separate note. (Section 6)

- The City of Lorain is identified as having two repetitive loss properties with total payments of \$320,000, averaging \$160,000 per property. The Village of South Amherst has two repetitive loss properties with total payments of \$334,000, averaging \$167,000 per property. South Amherst has a severe repetitive loss property with \$148,000 in payments. (5-45) These repetitive loss properties are identified in mitigation strategies 4.1 (City of Lorain) and 2.1 (Village of South Amherst). The only recommendation is to use the plan to help further advance the development of these strategies, especially such high priority ones. Identifying the main point of contact is a good start, but next steps could also be vetted.
- Some of the communities identified the need and prioritized the development of a comprehensive land use plan.
- The plan includes a wide variety and scale of mitigation activities. Some require funding and others require only staff time and political support. Some of the mitigation activities are also very specific in nature, showing more thought, commitment, and involvement at the jurisdiction level. Some are social in nature, some are technical, some are building/zoning codes, and some are physical projects. A very diverse collection of specific strategies for each community.

B. Resources for Implementing Your Approved Plan

The plan includes a list of mitigation actions that appear realistic and feasible. The county should pursue funding for the projects under the different mitigation grant programs. These grant programs include the following:

HMGP

The Hazard Mitigation Grant Program (HMGP) is authorized by Section 404 of the Robert T. Stafford Disaster Relief and Emergency Act, as amended. The key purpose of HMGP is to ensure that the opportunity to take critical mitigation measures to reduce the risk of loss of life and property from future disasters is not lost during the reconstruction process following a disaster. HMGP is available, when authorized under the Presidential major disaster declaration, in areas of the State requested by the Governor.

PDM

The Pre-Disaster Mitigation (PDM) program is authorized by Section 203 of the Stafford Act, 42 USC 5133. The PDM program is designed to assist States and local communities to implement a sustained pre-disaster natural hazard mitigation program to reduce overall risk to the population and structures from future hazard events, while also reducing reliance on Federal funding from future major disaster declarations.

FMA

The Flood Mitigation Assistance (FMA) program is authorized by Section 1366 of the National Flood Insurance Act (NFIA) of 1968, as amended with the goal of reducing or eliminating claims under the National Flood Insurance Program (NFIP).

SECTION 3:

MULTI-JURISDICTION SUMMARY SHEET (OPTIONAL)

County: Lorain

City: Amherst, Avon, Avon Lake, Elyria, Lorain, North Ridgeville, Oberlin, Sheffield Lake, Vermillion

Villages: Grafton, Kipton, Lagrange, Rochester, Sheffield, South Amherst, Wellington

Township: Carlisle