

SECTION SIX PLAN MAINTENANCE

Section Six consists of the following six subsections:

- 6.1 IFR Requirements for Plan Maintenance Process
- 6.2 Monitoring, Evaluating and Updating the Plan
- 6.3 Monitoring Implementation of Mitigation Actions
- 6.4 Reviewing Progress on Achieving Goals
- 6.5 Reviewing Progress on Activities and Projects in the Territorial Mitigation Strategy
- 6.6 Progress in Implementation of Past Plan Recommendations and Actions

6.1 IFR REQUIREMENTS FOR PLAN MAINTENANCE PROCESS

§201.4(c)(5)(i-iii) of the Interim Final Rule (IFR) requires the Territorial Hazard Mitigation Plan to include a section that describes the Plan Maintenance Process that the Territory will use to ensure that the Plan is current. The specific language in the IFR states that “*the Standard State Plan Maintenance Process*” must include:

- *An established method and schedule for monitoring, evaluating and updating the plan;*
- *A system for monitoring implementation of mitigation measures and project closeouts;*
- *A system for reviewing progress on achieving goals, as well as, activities and projects identified in the mitigation strategy.”*

6.2 MONITORING, EVALUATING AND UPDATING THE PLAN

6.2.1 RESPONSIBLE PARTIES

The US Virgin Islands Territorial Emergency Management Agency (VITEMA) established a Hazard Mitigation Steering Committee for the 2014 Plan Update, and for implementation of actions identified in the Plan.

The newly appointed **Territory Hazard Mitigation Officer, Mr. Haldor Farquhar**, established the Hazard Mitigation Steering Committee, with the charge of overseeing the Plan Update process and for the provision of technical assistance to territorial agencies during the planning process. Mr. Farquhar will act as the chairperson the Hazard Mitigation Steering Committee. The members of the Hazard Mitigation Steering Committee have agreed to work on implementation of actions defined in the 2014 Plan Update. Members are highlighted in Table 6.1.

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TABLE 6.1 Hazard Mitigation Steering Committee

Name	Agency/ Department
Haldor Farquhar***	VITEMA
Austin Callwood	VITEMA
Joanne White	VITEMA
Malinda Vigilant	VITEMA
Renata Christian	VITEMA
Debra Henneman-Smith	VITEMA
Oliver Morton	VITEMA
*** Chairperson	

The Hazard Mitigation Steering Committee will be in charge and responsible for the implementation of the actions defined in Section Five of this Plan Update. It is necessary to note that this Committee consists of members of VITEMA staff, and it was decided that a smaller committee of emergency management staff, would be more effective in reviewing, monitoring, and evaluating progress in plan implementation.

This Committee will, therefore, be responsible for monitoring progress of the implementation of specific actions and ensuring that the overall goals and objectives of the Hazard Mitigation Plan are reached.

6.2.1 MONITORING AND EVALUATING THE PLAN

The Hazard Mitigation Steering Committee will meet once a year to monitor and evaluate progress in plan implementation. This process will include periodically validating underlying assumptions and identifying and securing updated information.

Specific issues that will be monitored and the appropriate procedures include:

1. Changes in information available to perform vulnerability and risk assessments. This will include the collection and update of hazard information, hazard profiles as well as inventory, especially critical facility information from the Department of Property and Procurement.
2. Changes in laws, policies, or regulations: The VITEMA Hazard Mitigation Steering Committee will keep abreast of changes in laws and regulations that have been passed. Particular attention will be given to pending laws as well to determine the potential impacts, if any, to hazard mitigation implementation.
3. Changes in territorial agencies or their procedures that will affect how mitigation programs or funds are administered. This will entail, liaising with Hazard Mitigation Committee members on all three islands and reviewing the different programs in key agencies, such as DPNR, DPW and WAPA. Review of these agencies must entail a determination to ascertain if any changes during the preceding 12 months would affect USVI hazard mitigation programs.
4. Changes in funding sources or capabilities: On an annual basis, VITEMA Hazard Mitigation Steering Committee members would formally convene to review federal funding opportunities

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and the administration of grant programs. This will include an overview of project closeouts or new mitigation actions that the Territory is considering. This activity will result in the development report would include the tracking the status of Territorial and Federal funding for hazard mitigation projects.

5. The timing for the annual review should be made in anticipation of the FEMA HMA annual funding cycle so that the findings of the review can be considered prior to finalizing grant applications.

Based on this information, the VITEMA Hazard Mitigation Steering Committee will evaluate the plan annually. The Steering Committee will initiate the evaluations, by formally notifying FEMA Caribbean Area Division (CAD), and execute an action plan to gather information outlined above.

The VITEMA Steering Committee will contact the FEMA CAD and send out a series of letters to Territorial agencies to solicit information. A special session of the Hazard Mitigation Committee will be initiated through teleconference, in order to discuss progress, identify pending items and consider appropriate revisions for the next Plan Update.

VITEMA understands that the next Plan Update cycle may well be five years rather than the historical 3 year cycle.¹ This change will make the annual reviews even more important for monitoring and evaluation of plan progress.

In the first four (4) years of the next Plan Update cycle, VITEMA will make contact with agencies in November to solicit the required information, hold a meeting December (before the Christmas holidays and before December 15th) in order to consider any revisions for the next Plan Update. In the fifth (5th) year, solicitation of information should take place in August and the follow-up meeting should be in September, in anticipation of a complete revision of the Plan that will be submitted to FEMA for re-approval in April of the following year. The evaluations will consider the information gathered as part of the monitoring process described above, and including:

1. Changes in hazard and vulnerability assessment information,
2. Changes in laws, policies, or regulations,
3. Changes in Territorial agencies or their procedures,
4. Changes in funding sources or capabilities, including status of FEMA project closeouts or new mitigation actions that the Territory is considering, and
5. Changes in VITEMA staffing, and/or composition of the Hazard Mitigation Monitoring Committee or island Hazard Mitigation Committees.

¹ April of 2014, FEMA promulgated a Final Rule that changed the frequency of Mitigation Plan Updates (44CRR Part 201). The Final Rule extends the Plan Update requirement for States and Territories from 3 to 5 years.

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6.2.3 UPDATING THE PLAN

The Plan will be updated and re-submitted to FEMA for re-approval every five years, as required by law. VITEMA also has the prerogative to update the Plan at times other than those identified in this section, under the following general conditions.

1. After a major disaster declaration.
2. At the request of the Governor.
3. When significant new risks or vulnerabilities are identified during monitoring and evaluation procedures.

The VITEMA Hazard Mitigation Steering Committee will initiate and lead all Plan updates. The two sub-paragraphs below describe the procedures for interim and three-year updates, respectively.

6.2.3.1 Updates Resulting from Interim Evaluations

The nature of Plan updates will be determined by the evaluation process described above. In general, the VITEMA Steering Committee will notify the specific island Hazard Mitigation Monitoring and Evaluation Committees that the agency is initiating an interim plan update, and describe the circumstances that created the need for the update. VITEMA will consult the island Hazard Mitigation Committees regarding potential changes. If it is determined that the Hazard Mitigation Committees should be involved, the nature of the involvement will be at the discretion of VITEMA.

When interim updates are completed, VITEMA will advise all Hazard Mitigation Committee members via email that the Plan has been updated, and describe the nature of the update.

6.2.3.2 Updates Related to the Required Three-year Plan Review

As required by the Final Rule (44CFR Part 201), every five years the Plan will be updated for re-submission and re-approval by FEMA. In those years, the evaluation process will be more rigorous, and will examine all aspects of the Plan in detail. It is anticipated that several meetings of the Hazard Mitigation Committees will be required and that the Governor will formally re-approve the Plan prior to its submission to FEMA.

Based on the deadline established for the initial plan in the month of April, VITEMA anticipates that the submission date for the required update will be approximately April, 2019. Prior to that time, VITEMA will contact members of the Hazard Mitigation Monitoring and Evaluation Committee members and other appropriate agencies and organizations to determine a schedule for the Plan update.

The update process will entail a detailed and structured re-examination of all aspects of the Plan, followed by recommended updates. The recommendations will be presented to the VITEMA Director and the Hazard Mitigation Steering Committee, along with the Director, will take appropriate actions.

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Scheduling Updates

- Monitoring activities by VITEMA should be done on at the final Hazard Mitigation Steering Committee meeting each year;
- The Plan Update, in view of the criteria set forth in Section 6.2.1 will be documented in a formal memorandum report that defines progress made during the yearly cycle;
- Notices and solicitation of information regarding annual evaluations should be sent out November of the first four years of the Plan and in August of the fifth year.
- The timetable for evaluations and updates for the first four years is expected to last one month, while the evaluation for the fifth year is expected to last three months and be documented for the Plan Update.

6.3 MONITORING IMPLEMENTATION OF MITIGATION ACTIONS

6.3.1 MONITORING MITIGATION PROJECTS

Mitigation projects are generally monitored as follows.

- Each mitigation project or activity (such as planning) has an established period of performance that VITEMA and FEMA monitor throughout the development and execution of the activity to whom quarterly reports are sent.
- VITEMA regularly meets with representatives from FEMA Region II Caribbean Area Division to coordinate project monitoring activities.
- Every calendar quarter, VITEMA send letters to all sub-grantees with open projects (i.e. ones that have been funded but are not completed), requesting a project progress update.
- Each of the sub-grantees responds to the VITEMA request by preparing a standard report that details progress on individual mitigation projects, and indicates the percentage complete.
- VITEMA compiles the sub-grantee progress reports, and produces a consolidated quarterly report that is sent to FEMA Region II Caribbean Area Division for review.

VITEMA as an agency does not provide separate funding for hazard mitigation projects and does not have any direct influence over the implementation process for projects funded by other Territorial agencies.

For mitigation projects that are funded by non-federal sources such as capital budgets of other territorial agencies, should be described. It will be the responsibility of VITEMA to describe the implementation status of mitigation project, unless otherwise specified at the Hazard Mitigation and Monitoring Committee meetings. The primary focus of these reports will be on providing the VITEMA Steering Committee with an understanding of which projects are progressing well toward meeting scheduled completion dates and which projects may be lagging behind their schedule, requiring intervention.

6.3.2 MONITORING PROJECT CLOSEOUTS

Federally-funded mitigation project closeouts occur in the following sequence. These procedures were established in accordance with FEMA HMGP guidelines as set out in the HMGP Desk Reference and the Virgin Islands HMGP Administrative Plan.

- Sub-grantee indicates in a quarterly project progress report that a mitigation project is 100 percent complete.
- VITEMA reconciles FEMA SmartLink account for the project (by disaster).
- VITEMA initiates a comprehensive internal financial audit of the project.
- VITEMA resolves any issues discovered in the audit.

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- VITEMA sends FEMA Region II Caribbean Area Division (CAD) a closeout letter that delineates the final eligible cost of the project, and delineates any de-obligations that are required, as well as any monies that will be recovered from the sub-grantee.

6.4 REVIEWING PROGRESS ON ACHIEVING GOALS

Subsection 201.4 (c)(5)(iii) of the IFR states that the Territorial Hazard Mitigation Plan must include a system for reviewing progress on activities and projects that are included in the mitigation strategy.

In order to monitor progress on achieving the goals identified in this Plan, VITEMA will ensure that both the annual and five-year Plan evaluations include a detailed examination and analysis of the goals, and the various actions that are intended to achieve them. In future versions of the Plan, VITEMA will prepare tables to indicate the status of the various actions based on information from monitoring efforts detailed above, and a general indication of progress. A simple matrix was used during the 2014 Plan Update, which includes:

- Activity Number (delineated by island)
- Type: Existing or New Project
- Status: Implemented, Partially Implemented or Complete
- Description of Project:
- Priority: High, Medium and Low

It is necessary to note that for the Update of this Plan, there were no annual meetings or reports prepared for the specific purpose of updating the Plan. Therefore, the goals and underlying assumptions of the Plan were reviewed during the VITEMA Hazard Mitigation Steering Committee and Island Hazard Mitigation Monitoring and Evaluation Committee meetings that took place during the planning process for this Plan Update (2014).

6.5 REVIEWING PROGRESS ON ACTIVITIES AND PROJECTS IN THE TERRITORIAL MITIGATION STRATEGY

Subsection 201.4 (c)(5)(iii) of the IFR states that the Territorial Hazard Mitigation Plan must include a system for reviewing progress on activities and projects that are included in the mitigation strategy.

As part of the yearly and five-year evaluations and updates to this Plan, VITEMA will initiate a review of all activities and projects noted in the mitigation strategy. The review will take place in stages.

1. VITEMA will assemble a Steering Committee to undertake a preliminary review and analysis of progress on activities and projects that are listed in the mitigation strategy section.
2. The VITEMA Steering Committee will prepare a draft memorandum report that describes progress, remaining tasks and projected time to complete.

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3. The draft memorandum report will be presented to the Director during its final annual meeting related to the yearly (and five-year) updates.
4. After Director's review, comment and approval, results of the progress review will be added as an addendum to Plan.
5. VITEMA will submit the summary memorandum report describing the results of the yearly program evaluations to FEMA Region II CAD.

Again, no formal documentation or annual reports were developed for the review or monitoring of mitigation projects identified in the 2011 Plan. The VITEMA Steering Committee agreed that the review procedures outlined in the 2011, required only slight modification, as outlined in the previous section of this Plan Section (Section 6). The VITEMA Steering Committee concurred that better documentation is required during the upcoming Plan Update cycle.

6.6 PROGRESS IN IMPLEMENTATION OF PAST PLAN ACTIONS

Despite severe staffing and funding constraints, it is important to note that there has been some, albeit limited, progress in the implementation of past plan actions since the preparation of the 2011 Plan Update. The Island Hazard Mitigation Monitoring and Evaluation Committees were vital in determining which of the mitigation actions from the 2011 Plan had been fully or partially implemented. The major successes to report include:

- STT-2 -Pursue road reconstruction and drainage improvements to resolve recurrent flooding on Commandant Gade Gut (Garden Street) from Bunker Hill to Veterans Drive that affect businesses and emergency access.
- STT-3 -Pursue road reconstruction and drainage improvements to resolve recurrent shallow flooding on Radets Gade from Main Street to Veterans Drive that affect businesses.
- STT-4 -Pursue road reconstruction and drainage improvements to resolve recurrent shallow flooding on Storre Tvaer Gade from Main Street to Veterans Drive that affect businesses.
- STT-23 - Installation of High Impact Hurricane windows at the Department of Public Works (HMGP-1807).
- STT-22 - Installation of High Impact Hurricane windows at the Department of Property and Procurement (HMGP-1807).
- STT-24 - Installation of High Impact Hurricane windows at the Department of Education (HMGP-1807).
- STT-25 - Installation of High Impact Hurricane windows at the Department of Human Services (HMGP-1807).
- STT-11 - Pursue the acquisition of land for the relocation of the Downtown Fire Station that is susceptible to storm surges and tsunami.

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- STX-17 - Install storm shutters at the American Red Cross (HMGP-1807).
- STX-18 - Install storm shutters Emile Henderson, Sr. Fire Station (HMGP-1807).
- STX-19 - Install Roll-Up Doors at the Rencelier I. Gibbs Fire Station (HMGP-1807). Note: roll-up windows were installed instead.
- STX 21 - Install Fabric Shutter system at Henry E. Rohlsen Airport (HMGP-1807).
- STJ-10 - Install Storm shutters at the DeCastro Health Clinic (HMGP 1807).
- STJ -12 - Clean Gut at Westin Hotel.