

## Appendix X -Public Comment

The 2014 Hazard Mitigation Plan (HMP) updates and modifies the 2011 HMP, taking into account best available information and data to guide the State's efforts to mitigate risks from severe weather and other natural hazards. Among other things, the document was expanded to support continuity of operations prior to, during and after hazard events. It also includes enhanced processes and programs to advance local hazard mitigation planning throughout the State and to administer the FEMA grant programs that fund State and local mitigation projects and efforts.

In these and other ways, the 2014 HMP is a comprehensive update of the 2011 HMP. Acknowledging the need for flexibility in addressing hazard events, the HMP contemplates a process by which it may be updated and adapted based on additional information or changed circumstances. In this respect, the 2014 HMP is a "living document," and its ability to adapt is consistent with the State's intent to continue to mitigate risk to natural hazards in a practical, reasonable and effective way.

Input from the public is a crucial component of effectively developing a HMP. The public comment process for the 2014 HMP was a new and important addition to the planning process. Although not required by FEMA, the State sought to enhance the plan by engaging with interested parties and considering input from various stakeholders. Moreover, as detailed below, the HMP was meaningfully modified based on the more than one hundred comments from constituents and interest groups received during the thirty-day public comment period, each of which was reviewed by a cross-agency State Hazard Mitigation team. A few examples of modifications made to the HMP based on public comments include:

1. **Some stakeholders commented on the State's listed mitigation actions.** The original plan identified 20 new actions; the approved plan added 17 additional actions. New actions include, among other things, addressing the needs of the Port Authority, planning, and critical facilities.
2. **Some stakeholders commented on the State's efforts to recover and further develop resiliency.** A new subsection has been added to Section 6 titled 'New Programs and Changes in Capabilities' which summarizes changes in State capabilities since 2011. Within this new subsection, the responses from the State agency Capability Assessment Questionnaire which provided the opportunity for agencies to report changes in mitigation capabilities were summarized.
3. **Some stakeholders commented on the State's need for mitigation in the transportation system.** A new high priority NJOEM mitigation unit action has been added to Section 6, Table 6-14: 'Following the development and completion of the NJ Transit and PANYNJ vulnerability assessments (discussed in Section 5.1), the 2017 Plan update will incorporate their findings, recommendations and actions.'

Finally, as part of the HMP process, the State synthesized and responded to the public comments it received during the public comment period. The synthesized comments and responses are set forth below.

The State is committed to working with FEMA to continually make improvements to the HMP throughout the update and approval process and to continually evaluate hazards, and to maximize funding strategies to enhance resiliency through the mitigation of risks by natural hazards.

To read the entire approved 2014 State Hazard Mitigation Plan, please visit:  
[http://www.ready.nj.gov/programs/mitigation\\_plan2014.html](http://www.ready.nj.gov/programs/mitigation_plan2014.html)

### **Comment 1: HMP Development Process**

Commenters questioned the public outreach and stakeholder participation process associated with developing the HMP, and stated that the HMP to be submitted to FEMA at the end of March would not incorporate all public comments. Other commenters suggested that FEMA delay a final determination on the plan to allow for additional incorporation of public comments, or that the State develop an amended HMP within eighteen months that incorporates additional stakeholder comment with added input from non-governmental stakeholders. Another commenter suggested that the Hazard Mitigation Team be expanded to include additional stakeholder participants, and that guidance should be provided on how organizations may become involved in the HMP development process, and how stakeholder input will be gathered and incorporated. Another commenter suggested that all comments on the HMP should be published on a State website.

#### **Response:**

On January 14, 1994, Governor Florio signed Executive Order 115 creating the State Hazard Mitigation Team. As dictated in the Order, the team was created specifically for State agencies. The New Jersey State Police has since expressed and began to adhere to a more inclusive planning process. The development of a stakeholder working group for future plan updates is currently being considered.

As part of the HMP submission process, the State requested that FEMA push back the date for the initial submission of the HMP to FEMA to allow for the State to take public comments on the HMP and account for those comments in the plan as submitted to FEMA. FEMA indicated that the HMP submission date could not be changed, so the State submitted the initial HMP to FEMA on March 5, 2014, before the public comment period opened on March 11, 2014. To do otherwise would have threatened the State's continued receipt of FEMA Hazard Mitigation Grant Program monies that, among other things, fund a number of critical Superstorm Sandy recovery initiatives. However, as NJOEM stated when releasing the HMP for public comment, NJOEM is committed to a robust public and stakeholder comment process that enhances public participation in the development of the HMP. The public and stakeholder comment period lasted thirty days, from March 11, 2014 through April 11, 2014. The comments have been synthesized and responses provided, and submitted comments will be posted on a State website. In a number of cases, changes to the HMP have been made based on the comments.

Importantly, NJOEM will adhere to plan maintenance procedures and continue to review the plan for possible amendments, so certain comments that may take more time to evaluate can be addressed as part of that substantial amendment process during the 5 year cycle. Specifically, Section 7 (Plan Maintenance) discusses the schedule for technical updates, Section 7.2.9 states that: Until all 'next steps' outlined in Section 11 have been met, the State Hazard Mitigation Team has

met once this year and anticipates convening another meeting by the end of this year. The November 2014 State Hazard Mitigation Plan Update will include crosswalk items that have been deemed 'next steps' for 2014, technical updates, and a snapshot of progress to date. Yearly thereafter in November 2015 and 2016, updates will include remaining and ongoing next step items that will include updates on development of 2019 State Mitigation Plan Update.

Additionally, as noted in section 2.2.3 of the plan, coordination with interested stakeholders is already an essential part of the HMP process. Table 2-6 contains a list of 16 organizations that participated in the HMP process. Many of these organizations offer public meetings that address multiple aspects of the HMP. For example, at the annual conference of the New Jersey Association for Floodplain Management annual conference, a planning consultant presented a summary and status update of the 2014 Plan update in a break-out session. This forum provided an opportunity to all conference attendees to discuss or ask questions regarding the 2014 Plan update. This provides an opportunity for professionals in engineering, hydrology, geology, planning, code enforcement, floodplain management, and emergency management to participate in plenary sessions and concurrent sessions on a broad range of relevant topics.

The web version of the Plan will be updated annually around November. A summary will be included in an update appendix. This summary will detail any changes made during the monitoring and evaluation periods. If changes were to occur as a result of the State Hazard Mitigation Team bi-annual meetings, those will be outlined in the web version as well.

Each of these steps, alone and in combination, will ensure continued opportunity for outreach and comment with stakeholders and the public.

## **Comment 2: National Flood Insurance Program-Related Concerns**

Commenters raised a concern that the HMP does not account for recent changes to the Federal flood insurance landscape arising from the 2014 Grimm-Menendez Flood Insurance Affordability Act (the "Grimm-Menendez Act" or the "Act"). One commenter suggested that, consistent with the Grimm-Menendez Act, the HMP should incorporate alternative mitigation strategies beyond elevation, relocation and acquisition/demolition; though the commenter recognized that FEMA has yet to develop guidelines on how such alternative strategies might affect insurance premiums. Another commenter raised concerns about the impact of National Flood Insurance Program (NFIP) requirements on historic buildings, and supported alternative mitigation strategies for historic buildings that would allow the buildings to better preserve their historic character while making them more resilient.

**Response:** Pursuant to the Biggert-Waters Flood Insurance Reform Act of 2012, NFIP is moving toward an actuarial flood risk model that will increase the need for mitigation and assign more of the flood risk to a number of insured parties. The Grimm-Menendez Act, signed into law on March 21, 2014, ten days into the public comment period for the HMP, modifies certain provisions of the Biggert-Waters Flood Insurance Reform Act of 2012 and also vests discretion in the administrator of NFIP to make various changes to the program consistent with the Grimm-Menendez Act.

Among other things, the legislation requires the administrator of NFIP to establish guidelines that provide alternative methods of mitigation other than elevation to reduce flood risk in residential buildings, including for those that cannot be elevated. This requirement is consistent with a letter

that Governor Christie sent to FEMA leadership in May 2013 requesting that NFIP better account for the flood insurance-related challenges of structures that, for physical or historical reasons, cannot be elevated. The Grimm-Menendez Act does not describe any particular measures to be considered, however, and the NFIP administrator has one year to issue guidelines.

NJOEM will await guidance from the NFIP administrator on these issues and then evaluate potential changes to the HMP that may be warranted based on the guidance provided.

### **Comment 3: Coordination with the State Strategic Plan and the State Development and Redevelopment Plan**

A commenter suggested that the HMP be aligned with the State Strategic Plan, as well as State regulations and planning and financing programs. Another commenter suggested that the HMP should be consistent with the State Development and Redevelopment Plan (SDRP) maintained by the New Jersey State Planning Commission.

**Response:** Although the State Strategic Plan contains various elements that support or inform the HMP, the HMP does not expressly reference the State Strategic Plan because it has yet to be formally adopted. As to the SRDP and other relevant hazard mitigation documents in plans, essential elements of many of those plans are embedded in the policies, priorities and alternatives outlined in the HMP, even though those documents are not expressly referenced.

### **Comment 4: Local Hazard Mitigation Plans**

Various commenters supported a coordinated approach to ensure consistency between State and local hazard mitigation planning efforts. Commenters suggested that local hazard mitigation plans should be reviewed to ensure no inconsistencies with the HMP, and that the State should play a more active role in shaping local hazard mitigation plans, including providing technical assistance for counties and municipalities to support development of local hazard mitigation plans and to conduct risk assessments. An additional commenter recommended that the HMP allow for processes and reporting requirements that would promote the evaluation of the effectiveness of local hazard mitigation plans, including through the incorporation of uniform methods of analyzing vulnerabilities across local hazard mitigation plans. Commenters also noted that in order to be useful, the HMP should: evaluate the effectiveness of the Municipal Land Use Law in encouraging municipalities to prepare and update land use plans; assess what percentage of municipalities have ordinances that are consistent with their plans; evaluate whether communities have ordinances to address hazard mitigation; and identify where technical assistance is needed. A final commenter sought specificity within Section 3.2 regarding what requirements imposed on local hazard mitigation planning initiatives were additional State-imposed requirements, as opposed to Federal requirements. It was also noted that although the State probably has little direct authority over land use decisions and other county/local policies, this is another area of the HMP that could be used to establish some State-level preferences and priorities regarding hazard mitigation at the local, county or regional level.

**Response:** The State appreciates these comments. Initially, New Jersey is a “home rule” State and vesting significant authority and discretion in county and local government entities is often central to assuring, within a broader State framework, that counties and communities can identify projects and solutions that may be unique to their particular needs. Thus, any suggestion of an enhanced

State role in county and local hazard mitigation and planning initiatives must be carefully balanced against the autonomy that counties and communities are afforded in New Jersey to chart their own course.

With that said, particularly in the aftermath of Superstorm Sandy, there has been a concerted effort by the State to maintain open communication lines with impacted counties and municipalities on recovery and rebuilding initiatives, including hazard mitigation initiatives. For many communities at various points of the recovery, these conversations with the State occurred weekly or even daily through NJOEM, State departments and agencies administering recovery programs, the Governor's Office of Community and Constituent Relations or the Governor's Office of Recovery and Rebuilding. Conversations routinely touched on various hazard mitigation topics raised by commenters, and though these interactions are not documented in the HMP, the State expects that these communications significantly impacted communities developing local hazard mitigation plans post-Sandy.

Regarding the HMP and its interaction with local hazard mitigation plans, the HMP is the overarching statewide framework document that outlines policies, identifies potential hazards and discusses potential mitigation opportunities. As stated above, in respect of "home rule" in New Jersey, it is for the local hazard mitigation plans to operate within this broad framework in developing more detailed plans in response to community-specific hazards. Thus, it is in the local plans where the impacts of specific regulatory standards such as local floodplain management and zoning ordinances, which will vary across communities, will be addressed. (See <http://www.co.somerset.nj.us/hazard/pdf/Section%206%20-%20Mitigation%20Strategies%20081513.pdf> as an example).

This is not to say that NJOEM or the State is not involved in county and local hazard mitigation initiatives following completion of the HMP. To the contrary, NJOEM and other State departments provide technical assistance to counties and localities developing local hazard mitigation plans. Currently, NJOEM is assisting with updates to 18 county hazard mitigation plans. Completion of these and other local plan updates will continue to inform the development of the HMP, until it is once again updated at the end of the Federally mandated five-year planning cycle.

Finally, through increased staff resources, the State will seek to provide greater levels of hazard mitigation planning and plan implementation support by continuing to work with FEMA to continually make improvements to the HMP, to continually evaluate hazards with our local partners, and to maximize funding strategies to facilitate mitigation.

#### **Comment 5: Online Planning Platform & GIS Mapping**

Several commenters expressed support for a statewide online platform to capture data that can inform statewide and local resiliency planning initiatives. Another commenter suggested that the HMP incorporate language recognizing the importance of acquiring and maintaining GIS data as a critical tool for informing hazard mitigation strategies. Other comments suggested enhanced mapping to identify vulnerable or flood prone areas, as well as publication of status reports on key actions, and providing an open platform for evaluation and cross-comparison of local hazard mitigation plans.

**Response:** The State agrees with the commenters that promoting information sharing where possible, including through making relevant data and analyses available electronically, is an important component to effective hazard mitigation planning. Subject to national and State security concerns, as well as concerns that may arise relating to protecting privacy, the State will continue to make data and analyses publicly available.

Notably, in connection with Superstorm Sandy recovery, the State is exploring options for a web based virtual online platform that, among other things, will be able to capture hazard mitigation-related information across a number of public sources and overlay that information through GIS mapping software to enhance preparedness as well as hazard mitigation and response initiatives. The State envisions that a component of this system will be available for use by the public, again subject to the aforementioned security and privacy constraints.

#### **Comment 6: Scoring Hazard Mitigation Projects**

Various commenters inquired about scoring criteria for both pre-disaster and post-disaster hazard mitigation projects. One commenter suggested that scoring criteria should include additional points for projects focused on regional plans and projects. Another commenter stated that scoring criteria should include additional points for alternative mitigation projects that promote resilience. Additional commenters stated that points should be awarded for consistency with the State Development and Redevelopment Plan. Other commenters suggested that scoring projects should incorporate such factors as: implementation of land use or building regulations; improvements by localities in FEMA's Community Ratings System ratings, amount of participation in NFIP, success in implementation of past mitigation projects, and extent to which projects account for climate change and sea-level rise, all using benefit-cost analyses and established risk estimation methodologies. Another commenter challenged the benefit of certain scoring criteria, including preferences for elevations and acquisitions, flood water management, retrofits and warning and information systems. That commenter also questioned the use of negative scoring for a project with a benefit-cost ratio less than 1.0, and the relationship between the HMP and the administrative plan developed with respect to the disbursement of FEMA Hazard Mitigation Grant Program funds provided in connection with Superstorm Sandy recovery.

**Response:** In determining scoring criteria referenced in the HMP, the State focuses on several critical factors, including: (i) readily available data responsive to the criteria; (ii) objectivity of the scoring criteria; (iii) responsiveness of the criteria to the goals of the program; and (iv) responsiveness to any applicable Federal or State statutes and regulations that govern the use of funding. These factors ensure that funding determinations are grounded in objective determinations that further program goals and do not violate the law. Consistently, these same factors governed the development of threshold and scoring criteria for the recovery programs supporting Superstorm Sandy recovery funded through FEMA Hazard Mitigation Grant Program monies.

While some of the factors identified by the commenters already are incorporated directly or indirectly into the existing scoring criteria for various hazard mitigation programs and initiatives, the State appreciates the various suggestions made by the commenters for additional scoring criteria, and agrees that some of these suggestions may be useful in scoring hazard mitigation projects. The State will evaluate these suggestions going forward and, where appropriate, will incorporate additional criteria into the HMP responsive to modifications of relevant scoring criteria for hazard

mitigation initiatives. Additional scoring criteria will be considered next year as part of plan maintenance procedures detailed in Section 7, which also will involve significant public and stakeholder input. The State will also adjust the PDM/FMA ranking criteria based on yearly FEMA updates to their ranking criteria.

#### **Comment 7: Statutory/Regulatory Changes**

A commenter recommended amendments to the Municipal Land Use Law (MLUL) that would strengthen the role of hazard mitigation in municipal planning, including requirements that hazard mitigation planning be incorporated into municipal master plans and regional plans for certain areas. Another commenter suggested legislative changes to expand the authority of county governments commensurate with the additional responsibilities placed on them pursuant to the HMP. An additional commenter noted that the State should require vulnerability analysis and hazard mitigation as part of redevelopment.

**Response:** Regarding proposed amendments to the MLUL and legislative expansions of the authority of county governments, the comments are appreciated but are beyond the scope of the HMP. The HMP is prepared in response to currently enacted and applicable statutes and regulations. If statutes or regulations change, the HMP will be modified to ensure consistency with those requirements. Commenters seeking legislative action relating to hazard mitigation are encouraged to contact their elected representatives to discuss their proposals.

The State appreciates the comment regarding requirements that vulnerability and hazard mitigation analyses be undertaken as part of any redevelopment. This proposal requires further evaluation and will be considered in connection with NJOEM's plan maintenance as detailed in Section 7.

#### **Comment 8: Sea-level Rise / Climate Change**

A significant number of commenters raised the subjects of climate change and sea-level rise and their relationship to hazard mitigation. The comments varied in nature, from very broad to very specific concepts, suggesting that the subjects were either not sufficiently addressed as effects on hazards already identified in the HMP and that both should be defined as stand-alone hazards in the HMP. The comments related to these subjects touched almost every section of the HMP, from broadening the assessment as a risk on both the local and State level, to evaluative criteria, to impacts to infrastructure, natural systems, historic structures, addressing hazardous sites and hazardous substances shipping by rail car and barge, to data used for mapping, prioritizing mitigation projects and funding, research and tools for assessment, benefit-cost analyses, and mitigation strategies.

**Response:** The 2014 HMP update contains new additions related to sea-level rise and climate change. With these additions, the HMP supports efforts to ensure that critical facilities are more resilient in the face of future severe weather events and better able to withstand potential future sea-level rise and other hazards. Specifically, the coastal erosion profile and vulnerability assessment were significantly enhanced to include updated information on the hazard and best-available data. A summary of the twenty-five years of research on the New Jersey coastline conducted by the Richard Stockton College Coastal Research Center was also incorporated. Additionally, detailed descriptions of past incidents were added to this profile with a section dedicated to Superstorm Sandy's effect on New Jersey's shoreline.

The NJ Department of Environmental Protection (DEP) and other State agencies will continue to employ a science-based risk analysis to analyze forward-looking risks to inform the hazard mitigation process. Where appropriate, additional information will be incorporated through the plan maintenance described in Section 7.

#### **Comment 9: Beach Replenishment**

Commenters raised environmental, economic, public health and safety concerns relating to beach replenishment. Specific concerns included the destruction of fish habitats, the destruction of surf breaks, the creation of dangerous beach conditions, and negative impacts to local businesses. The areas of Elberon to Loch Arbour, Harvey Cedars, and Long Beach Island were all specifically mentioned. Other commenters noted the necessity of dune and beach restoration in Island Beach State Park and urged DEP to work with the US Army Corps of Engineers (USACE) and to do whatever is necessary to add Island Beach State Park to the USACE's current dune restoration project.

**Response:** The State continues to evaluate the costs, benefits and shortfalls of beach replenishment projects along the coastline. The State is performing a comprehensive review of opportunities to reduce flooding and storm surge in repetitive loss communities and other areas of the State that experienced significant loss from Superstorm Sandy through, among other things, collaborations with six universities and in partnership with the USACE. New Jersey and the USACE are examining the efficacy of risk reduction measures and opportunities to improve effectiveness of risk reduction measures through a layered approach to flood risk reduction. This comprehensive risk analysis framework leverages the expertise of the State's subject matter experts as well as reports, analyses, and tools to inform infrastructure investment. In addition, the National Environmental Policy Act (NEPA) requires that USACE conduct an environmental assessment prior to initiating projects. This includes the assessment of a project's potential impact on the environment and notifying the public of findings.

Additionally, using \$100 million of second round CDBG-DR funds provided to New Jersey by HUD for Superstorm Sandy recovery, the State created the Flood Hazard Risk Reduction Program. The program, which will be administered through DEP's newly created Office of Flood Hazard Risk Reduction, will dedicate funding to important flood hazard risk reduction and resilience initiatives, with particular focus on flooding concerns not being addressed through other funding initiatives, including the beach replenishment projects to be undertaken by the USACE.

#### **Comment 10: Expansion of the SHMP**

Many commenters noted areas where the HMP should be expanded to include new topics, or greater detail on existing topics, such as: addressing historic buildings, more comprehensively addressing alternative mitigation strategies; and developing a more consistent methodology for assessing vulnerability. Other specific items that were noted for consideration include:

With regard to specific infrastructure: protection measures for the northern regional transportation network and an increased focus on the northern portion of the State in the



Hudson Raritan Estuary; providing greater priority to water supply protection; and improvements needed to secure our aviation and freight rail systems from hazards.

Commenters also suggested expanding the scope of the HMP to specifically address:

1. Protection of special needs populations such as the disabled, elderly, and low-income renter populations;
2. A systematic evaluation and incorporation of the three pillars of sustainability (economic, social and environment);
3. The impact of New Jersey's property tax system, as it that militates against rational mitigation through retreat;
4. The importance of resiliency and hazard mitigation in retaining and regaining the State's ability to compete as a player in the global economy;
5. Hazards in addition to flooding, including wind vulnerabilities;
6. The roles and the effectiveness in carrying out those roles, of the National Guard Units in the State;
7. A method for resolving the obstacles in meeting DEP requirements for stream clearing and infrastructure repair;
8. Information on the frequency of contra flow plan exercise and the degree to which advance notice is given; and
9. The funding section chart should identify available funding and the ways in which each program arrives at its funding decisions.

Many comments related to the expansion of detail in the areas of the HMP that address mitigation activities and strategies including:

1. Information on potential flood losses and impacts to coastal wetlands in the back bay and estuarine areas;
2. Incorporation of a comprehensive strategy for reduction of flood risk or statewide plans for buyouts and restoration of flood plains;
3. An outline of priorities for funding for local hazard mitigation actions and encouraging and funding nature-based solutions including green infrastructure, strategic retreat including buyouts and the development of local land use tools to move people and infrastructure out of harm's way;
4. Specific strategies to reduce development in increasingly vulnerable areas or a plan to provide funding to projects that meet that goal;

5. Restoration of the HMP Goal supporting local hazard mitigation planning and adding a new HMP Goal, “Minimize future vulnerabilities through strategic planning”;
6. Concrete and specific descriptions of efforts, capabilities, and approaches that will satisfy the six stated Goals;
7. A qualitative and quantitative evaluation of all mitigation programs, including benchmarks and performance metrics, and policy statements that express an agency’s roles and responsibilities in hazard mitigation planning and recovery;
8. Evaluations of the State’s performance in a range of mitigation-related areas, and identification of specific mitigation activities the State considers to be priorities, except for a preference for acquisitions and elevations, including an indication of activities that are considered priorities for retail fuel, energy, and local infrastructure;
9. Specifications of mitigation goals and how community projects will be ranked in the application process that may include a system such as that used to rank Severe Repetitive Loss (SRL) properties that was required by FEMA and could be expanded to include all mitigation activities; and
10. Replacement of today’s project scoring processes with an objective, criteria-based, transparent methodology that is immune from political influence.

**Response:** The State appreciates these comments. Notably, some of the identified items are beyond the scope of the HMP and thus cannot be addressed in future plans. These items include: the effects of climate change on property taxes; the role of the State’s National Guard Units and their effectiveness in carrying out their roles; incorporation of a method for resolving obstacles in meeting DEP requirements for stream clearing and infrastructure repair; and the inclusion of information on the frequency of contra flow plan exercise and the degree to which advance notice is given.

As to comments within the scope of the HMP, it is noteworthy that this 2014 comprehensive update expands many areas set forth in the previous plan, including additions relating to sea-level rise, the planning process, and risk profiles including maps and data, among other things. The State also expects that each HMP update will add to the comprehensiveness of the plan, using data and analysis available at the time of the HMP update. The State is committed to working with FEMA, as well as with interested stakeholders and the public, to continue to improve the HMP, and enhance opportunities to incorporate resilience measures across the State. Consistently, the above-summarized comments within the scope of the HMP require further consideration and will be fully evaluated as part the plan maintenance process detailed in Section 7. In connection with that process, changes suggested by the commenters will be incorporated as appropriate into that amendment.

#### **Comment 11: Use of the HMP**

Many commenters discussed use of the information contained in the HMP for additional purposes including: evaluating and reporting on prevalence and effectiveness of building codes and floodplain

regulations; establishing and adhering to funding priorities in the plan when grant funds are available; accounting for regional mitigation or resilience components when scoring projects; ensuring consistency with the State Development and Redevelopment Plan; and requiring consistency between approved hazard mitigation plans, municipal master plans and reexamination reports.

**Response:** The State agrees with commenters that the HMP can be a useful tool in facilitating conversations at the State, county and local level regarding various components of hazard mitigation policies and initiatives. As set forth in the response to Comments Three and Four, hazard mitigation planning is an ongoing activity for State, county and local departments and agencies. Discussions among these entities can include assessments of the effectiveness of building codes and floodplain regulations, scoring of hazard mitigation projects, and other potential uses of HMP information referenced by the commenters.

### **Comment 12: Corrections and reorganization**

Several commenters noted typographical and errors, requested specific language clarifications, or made suggestions regarding organization of the HMP. They include:

1. Table 4.1, replacement of the word “watershed” with “watershed management area”;
2. Section 5.2.3, clarifying the location of the responsibilities of The Coastal Management Office within DEP;
3. Table 5.2-5 Coastal Erosion Incidents in New Jersey, 1936 to 2012, that there have been additional storms other than those listed in this table;
4. On Page 5.2-34, under Climate Impacts, the document “Climate Change In New Jersey: Trends and Projections (Rutgers 2013)” has been replaced by “State of the Climate: New Jersey” published by the Rutgers Climate Institute (Broccoli et al. 2013);
5. Rather than organizing actions by the year of the HMP, organize them by the goal(s) and objectives(s) the HMP is striving to achieve, or other types of action, or a categorization that is more helpful for tracking progress with achieving goals and objectives;
6. Within Table 6.9 include a status of the action or progress in pace of the statement “ongoing capability or responsibility”; and
7. Goal 6 from Executive Summary: Support continuity of operations pre-, during and post-hazard events (new in 2014). Goal 6 from Section 6 (Risk Assessment): Continue to enhance and strengthen local mitigation capabilities. The latter goal seems very similar to Goal 5 from the Executive Summary (Enhance State and local mitigation capabilities to reduce hazard vulnerabilities), and these goals could be merged.

**Response:** The noted errors and clarifications will be made to the HMP. Organizational comments will be considered as the HMP is updated.

### **Comment 13: Risk analysis**

Several comments related to the risk analysis used by the State in the HMP process. A commenter noted that New Jersey should ensure that its risk analysis takes into account both the historical record of hazard events as well as the projected future impacts. Another commenter offered that the State should fund risk studies through FEMA grant programs to the extent possible, with an emphasis on studies that include sea-level rise and have direct links and influences on FEMA grant program projects. This could be done through expanded funding and increased standards for mitigation plans. A third commenter stated that although the HMP addresses at-risk assets and other vulnerabilities, systematic evaluation and incorporation of the three pillars of sustainability (economic, social and environment) would benefit the State and more fully address risk reduction using the National Academy of Sciences framework for incorporating sustainability into risk assessment/risk management-based decision-making.

**Response:** The State appreciates these comments. As stated above in response to Comment 10, the HMP will become more comprehensive with each update based on data and analysis available at the time of the update. The State is committed to working with FEMA to continually make improvement to the HMP, to incorporate robust public and stakeholder comment into the HMP process and to provide increased opportunities to enhance resilience around the State. University studies, improvements in flood mapping, modeling and the GAP analysis noted in the response to Comment 8 all will improve and expand risk analysis used to prepare the HMP. Generally, commenters' proposals regarding the risk analysis require further evaluation, and will be considered in connection with NJOEM's plan maintenance process detailed in Section 7.

### **Comment 14: Benefit Cost Analysis**

A commenter noted that although benefit-cost analyses (BCAs) are not required for every hazard mitigation grant project, they are in many cases, and this information could be used in the HMP. Correctly done, BCAs show the expected future losses avoided (mitigation) by the project.

**Response:** The State appreciates the comment and agrees that BCAs, where incorporated, can be a useful tool in identifying successful mitigation strategies. Where information from BCAs and other appropriate metrics are readily available, State agencies responsible for administering funded infrastructure programs utilize such data for decision making. Consistently, while specific BCAs are not an express component of the HMP, experiences with hazard mitigation projects and the BCAs applicable to those projects often inform the goals and opportunities highlighted in the HMP. NJOEM is also considering a loss avoidance study as part of the plan maintenance process.