



Cumberland County Multi-Hazard Mitigation Plan Update  
**Participating Jurisdiction Appendices**

**Appendix 6**  
**Fairfield Township, New Jersey**

August 22, 2022

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## Part 1: Overview

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### Part 1.1: Cumberland County Multi-Hazard Mitigation Plan Update

The Cumberland County Multi-Hazard Mitigation Plan Update (CC HMPU) incorporates input from all 15 participating jurisdictions in Cumberland County, including Cumberland County and 14 separate municipalities.

The CC HMPU is an update of the Mitigation Plan for Four New Jersey Counties (NJ4 HMP) that was completed by all fifteen jurisdictions in Cumberland County along with over 70 additional jurisdictions from Camden, Gloucester, and Salem Counties. The Cumberland County portions of the NJ4 HMP were adopted by the participating jurisdictions and approved by the Federal Emergency Management Agency in 2016.

The CC HMPU has two main parts:

- Cumberland County Multi-Hazard Mitigation Plan Update, or the “Base Plan”.
- County and Municipal Appendices.

The Base Plan includes descriptions and information common to all 15 participating jurisdictions organized according to the following three focus areas:

- Planning Process
- Hazard Identification and Risk Assessment
- Mitigation Measures

The County and Municipal Appendices include specific information for these same three focus areas for each of the 15 participating jurisdictions. Detailed tabulations are included in these Municipal Appendices for critical facilities, the status of past mitigation activities, and proposed mitigation measures for each municipality.

### Part 1.2: Fairfield Township Municipal Appendix

This Municipal Appendix is focused on Fairfield Township in Cumberland County, New Jersey.

The Fairfield Township Municipal Working Group developed the Fairfield Township Municipal Appendix for adoption by the Fairfield Township Committee and subsequent approval by Region II of the Federal Emergency Management Agency.

## Part 2: Participation

### Part 2.1: Municipal Working Group Participation

Part 2.1 includes:

- *Municipal Working Group members including positions in the community, meetings and work sessions attended, and specific contributions to the Municipal Appendix*
- *Municipal positions and organizations that were invited but were not able to participate in the plan update process*
- *Municipal positions and organizations that have been recommended by the Federal Emergency Management Agency (FEMA) as candidates for participation on Municipal Working Groups but do not exist in the municipality*

Table 6-1 identifies the Municipal Working Group members. As detailed in *Section 2: Planning Process* of the Base Plan, the Municipal Working Groups are comprised of community representatives who worked to make sure mitigation measures included in the Municipal Appendix addressed the risks faced by residents, businesses, and property owners and reflected the priorities of the community.

Municipal Working Group members reviewed briefing materials and contributed during Work Sessions and Meetings and reviewed the Preliminary Draft and Public Review Draft versions of the CC HMPU Base Plan and Appendices. The Working Group will also continue to stay involved during the implementation and maintenance of the CC HMPU.

Due to the on-going COVID-19 pandemic during the plan update process, Working Group meetings were conducted in a variety of ways including virtual meetings. However, when local conditions permitted, in-person meetings were conducted.

*Note: Two members of the Working Group also participated in the development of the 2016 NJ4 HMP. These members are indicated with an (\*) following their last names.*

**Table 6-1: Fairfield Township Working Group**

First Name	Last Name	Department	Position	Project Kick-off Meeting <sup>1</sup>	Round 1 Work Session <sup>2</sup>	Round 2 Work Session <sup>3</sup>	Contribution <sup>4</sup>
Michael	Burden	Administration	Administrator / Emergency Management Coordinator (until January 2022)	☑	☑	☑	Organized Working Group and Work Sessions.
Ken	Brent	Office of Emergency Management (OEM)	Emergency Management Coordinator (as of January 2022)				
Johnny	Bogan *	OEM	Deputy Emergency Management Coordinator (until February 2022)		☑		

<sup>1</sup> Project Kickoff Meeting was held on May 20, 2021.

<sup>2</sup> Round 1 Work Session was held on August 20, 2021.

<sup>3</sup> Round 2 Work Session was held on November 12, 2021.

<sup>4</sup> Additional or unusual contributions are noted in the far-right hand column.

## Part 2: Participation

First Name	Last Name	Department	Position	Project Kick-off Meeting <sup>1</sup>	Round 1 Work Session <sup>2</sup>	Round 2 Work Session <sup>3</sup>	Contribution <sup>4</sup>
Michelle	Hinson	OEM	Deputy Emergency Management Coordinator (since February 2022)				
Ben	Byrd	Township Committee	Mayor				
Marvin	Pierce	Township Committee / Fairfield Volunteer Fire Co. #1	Deputy Mayor / Chief				
Marion	Kennedy	Environmental Commission	Chairman				
Robert	Mulford *	Engineering	Township Engineer / Floodplain Administrator				
Jonathan	Burks	Public Works	Director		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Eric	Kizner	Planning	GIS / IT Specialist				
Michelle	Kennedy	School Board	Member				

The following lists candidate positions and organizations within the community that were extended invitations to participate] during the development of the Municipal Appendix. These positions and organizations will continue to be extended invitations to participate during subsequent plan implementation and maintenance activities.

- Building Code Official (via shared services with Upper Deerfield Township)
- Emergency Medical Services (via Inspira Hospital)
- Community / Faith-Based Organizations (via pending Interfaith Council)

The following lists positions and organizations that are generally recommended for consideration as members of the Municipal Working Groups by FEMA but do not currently exist within the community. An invitation to participate will be extended if positions are created or filled and as organizations are formed.

- Police
- Environmental Organizations
- Non-Governmental Organizations
- Critical Infrastructure and Key Resources
- Business Associations
- Major employers and businesses
- Healthcare Institutions

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## Part 2: Participation

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### Part 2.2: Public Participation

Part 2.2 includes all opportunities provided to the public and interested parties in the municipality to participate during the plan update process.

Table 6-2 identifies the date, type of involvement, and location (where applicable) for all opportunities provided to the public and interested parties to participate in the development of the plan update.

**Table 6-2: Public Participation**

Date	Type of Involvement	Location
June 8, 2021	Link to Project Website <sup>5</sup> established and maintained.	Township website <sup>6</sup>
August 20, 2021	Public meeting conducted with presentation and open discussion.	Fairfield Township Municipal Building
September 8, 2021	Preliminary Draft Municipal Appendix available for public comment.	Project Website <sup>5</sup>
September 11, 2021	Notice posted re: Preliminary Draft Municipal Appendix review period with link to Project Website.	Township website <sup>6</sup>
April 18, 2022	Notice posted re: Public Review Draft Municipal Appendix review period with link to Project Website.	Township website <sup>6</sup>
April 19, 2022	Public Review Draft Municipal Appendix available for public comment.	Project Website <sup>5</sup>

Public comments and input received for the Preliminary Draft and Public Review Draft versions of the Municipal Appendix were considered by the Municipal Working Group and incorporated into the Municipal Appendix where appropriate. In addition, the Municipal Appendix was adopted as part of a regularly scheduled public meeting.

Public education and outreach is an on-going mitigation measure included in the Municipal Appendix.<sup>7</sup> In addition, public participation will continue to be encouraged during subsequent plan implementation and maintenance activities.<sup>8</sup>

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<sup>5</sup> <http://fairfieldtownshipnj.org/>

<sup>6</sup> See Mitigation Measure M-1 in Part 4 of the Municipal Appendix.

<sup>7</sup> Public education and outreach is described in *Section 4: Mitigation Measures* of the CC HMPU Base Plan.



## Part 3: Hazard Identification and Risk Assessment

### Part 3: Hazard Identification and Risk Assessment

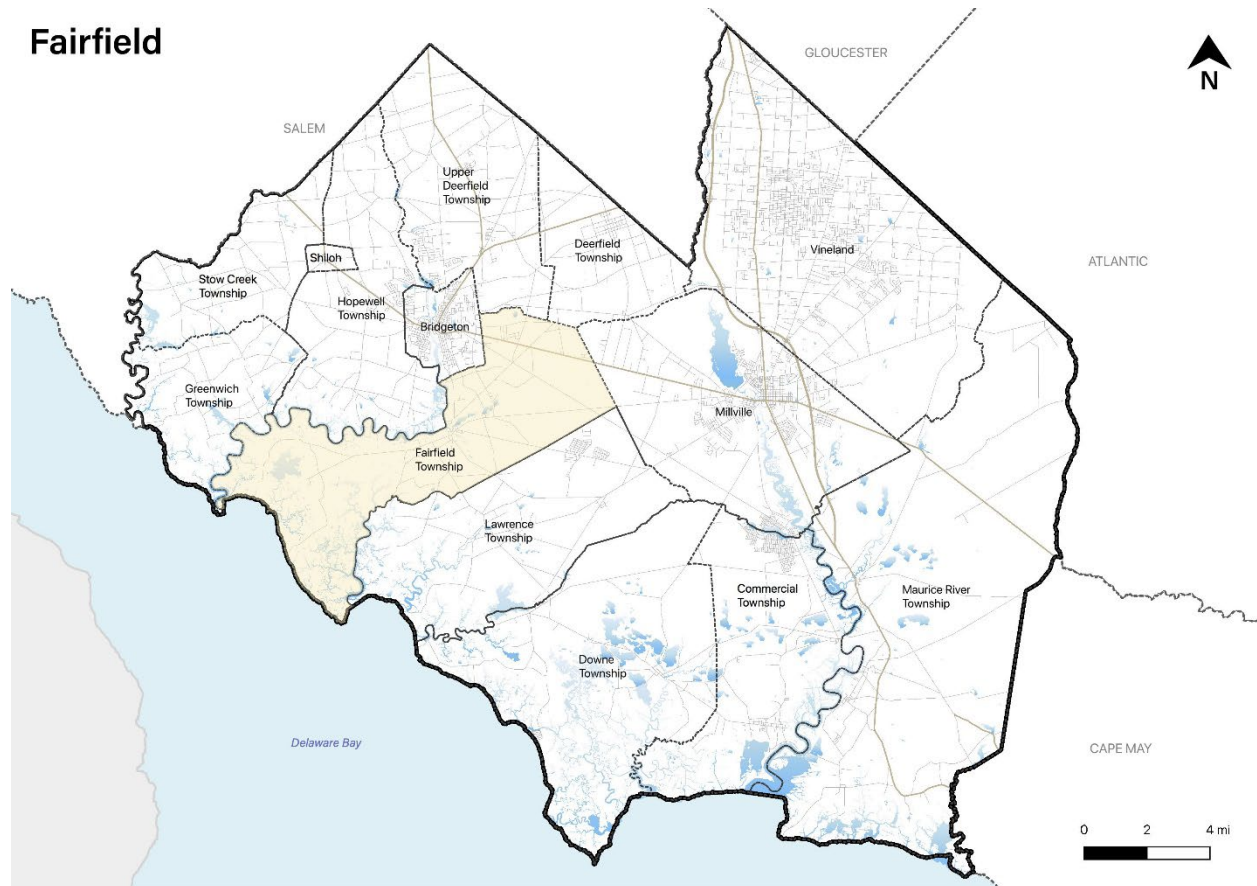
Part 3 includes seven subparts:

- *Part 3.1: Profile*
- *Part 3.2: General Building Stock*
- *Part 3.3: Critical Facilities*
- *Part 3.4: Hazard Exposure Assessment*
- *Part 3.5: Demographic Considerations*
- *Part 3.6: Observations*
- *Part 3.7: Hazard Priorities*

#### Part 3.1: Profile

Fairfield Township is located in the west-central part of Cumberland County (See Figure 6-1).

Figure 6-1: Fairfield Location Map

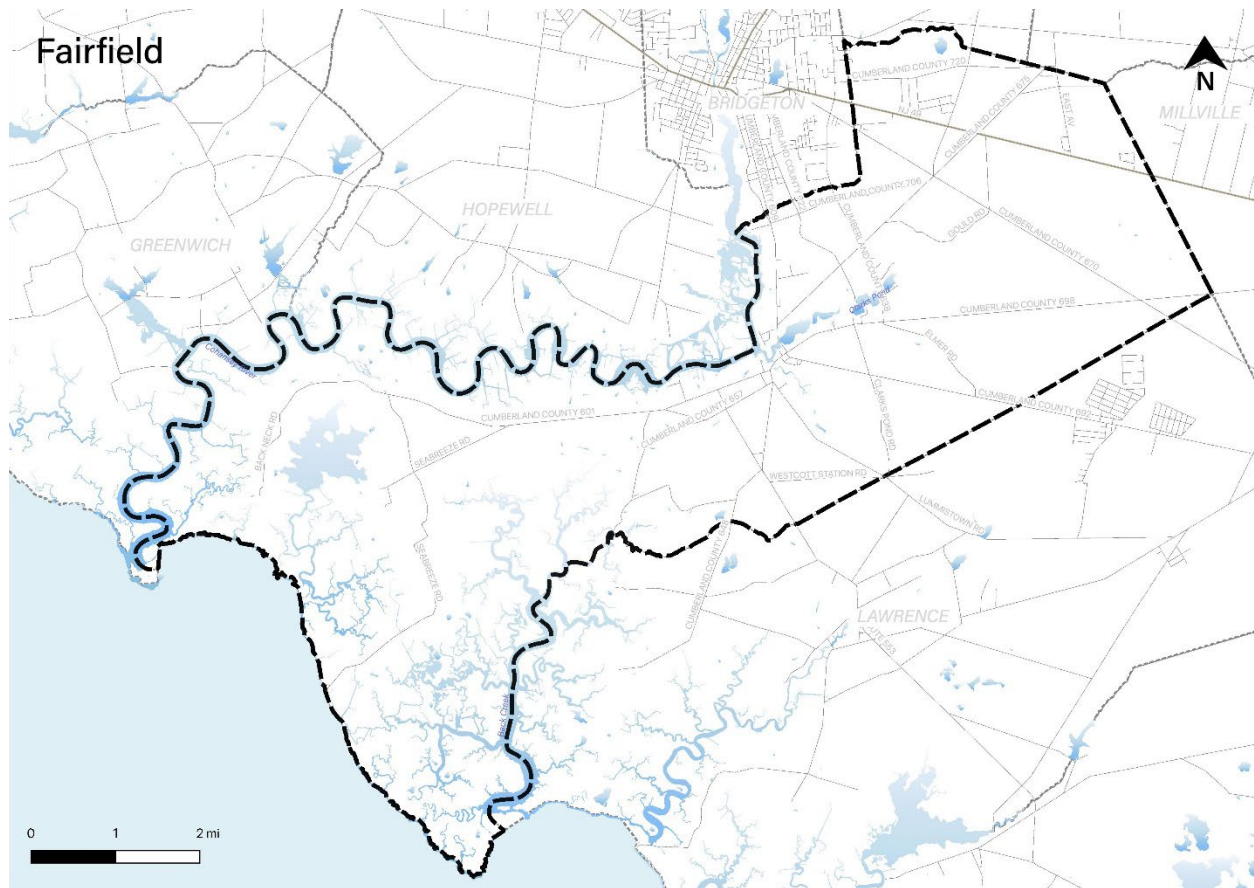


### Part 3: Hazard Identification and Risk Assessment

Fairfield Township is a historical town located in the western part of Cumberland County. The Township is a rural and agricultural community that is a blend of tidal marshes, open fields, and small communities. Approximately 88% of the land is agricultural, marine, state-owned or floodplain. Unincorporated communities include Fairton, Gouldtown, and Sea Breeze.

Per Figure 6-2, major water bodies include the Delaware Bay, which is the western boundary of the municipality, the Cohansey River, and the Rattlesnake Gut. Major transportation routes include State Highway Routes 49 and Cumberland County Routes 553 and 601. The land is predominantly flat and a high percentage of existing land cover consists of forests and marshes.

**Figure 6-2: Fairfield Township Base Map**



**Part 3: Hazard Identification and Risk Assessment**

**Part 3.2: General Building Stock**

As of 2015, there are 2,985 buildings in Fairfield Township with a total assessed value of improvements of \$380,701,500. Figure 6-3 shows the footprints of these buildings.

**Figure 6-3: Fairfield Township Building Footprints<sup>9</sup>**

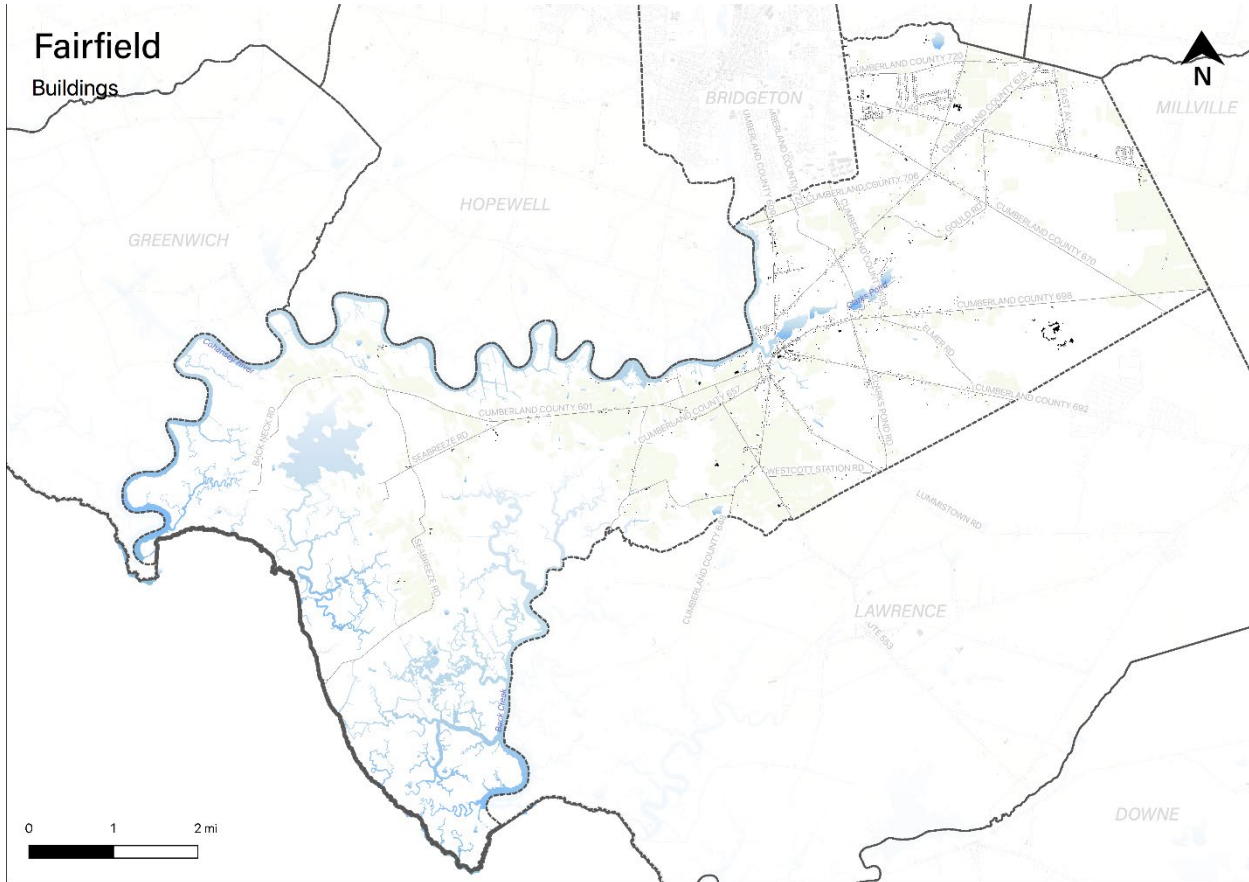


Table 6-3 shows the distribution of these structures according to land use distinctions.

**Table 6-3: Fairfield Township Buildings per Land Use Type<sup>10</sup>**

Land Use Type	Residential	Commercial	Industrial	Other
Number of Buildings	2,047	429	0	400
% of Total	71%	15%	0%	14%

<sup>9</sup> Building footprint data was isolated from “Impervious Surfaces” data (2015) per <https://gisdata-njdep.opendata.arcgis.com/>. Note: This (map/publication/report) was developed using New Jersey Department of Environmental Protection Geographic Information System digital data, but this secondary product has not been verified by NJDEP and is not state-authorized or endorsed.

<sup>10</sup> Land use types were isolated from MOD-IV Parcels and Tax Assessor data composite (2021) per <https://njogis-newjersey.opendata.arcgis.com/documents/parcels-and-mod-iv-of-cumberland-county-nj-shp-download/about> from the New Jersey Office of GIS

## Part 3: Hazard Identification and Risk Assessment

### Part 3.3: Critical Facilities<sup>11</sup>

As of April 2022, there are nine critical facilities in Fairfield Township.

Critical facilities are prime candidates for mitigation measures due to important functions staged from these facilities prior to, during, and after natural hazards including emergency services and housing vulnerable populations.

Table 6-4 includes current inventory information for municipal critical facilities and cross-references to related mitigation measures identified in Part 4 of the Municipal Appendix. Figure 6.4 shows the location of these critical facilities.

**Table 6-4: Fairfield Township Critical Facilities Inventory**

CF #	Name	Type	Sub-Type	Address	Co-located CF #	Shelter (Y/N)	Generator (Y/N)	Comments	Mitigation Measure #
CF-1	Township Hall	Municipal	Administrative Offices	70 Fairton Gouldtown Road, Bridgeton	CF-2, CF-5	Y	Y		
CF-2	Emergency Operations Center	EOC	Co-located Facilities	70 Fairton Gouldtown Road, Bridgeton	CF-1, CF-5	N	Y		
CF-3	Gouldtown Fire Company	FireStation	Stations	1137 Millville-Bridgeton Road, Bridgeton		N	Y	Portable generator	M-4
CF-4	Fairton Fire and Rescue Company	FireStations / EMS	Stations	43 Main Street, Bridgeton		N	Y		M-5
CF-5	Public Works	Public Works	Combined Administrative Office, Maintenance / Work Area, Equipment / material Storage, and Fueling Station	70 Fairton Gouldtown Road, Bridgeton	CF-1, CF-2	N	N		M-6
CF-6	Water Tower	Utilities – Water	Water Towers	375 Gouldtown-Woodruff Road, Bridgeton	CF-8	N/A	Y	Partial generator	M-7

<sup>11</sup> Critical facility definitions and considerations are described in *Section 3: Hazard Identification and Risk Assessment* of the CC HMPU Base Plan.

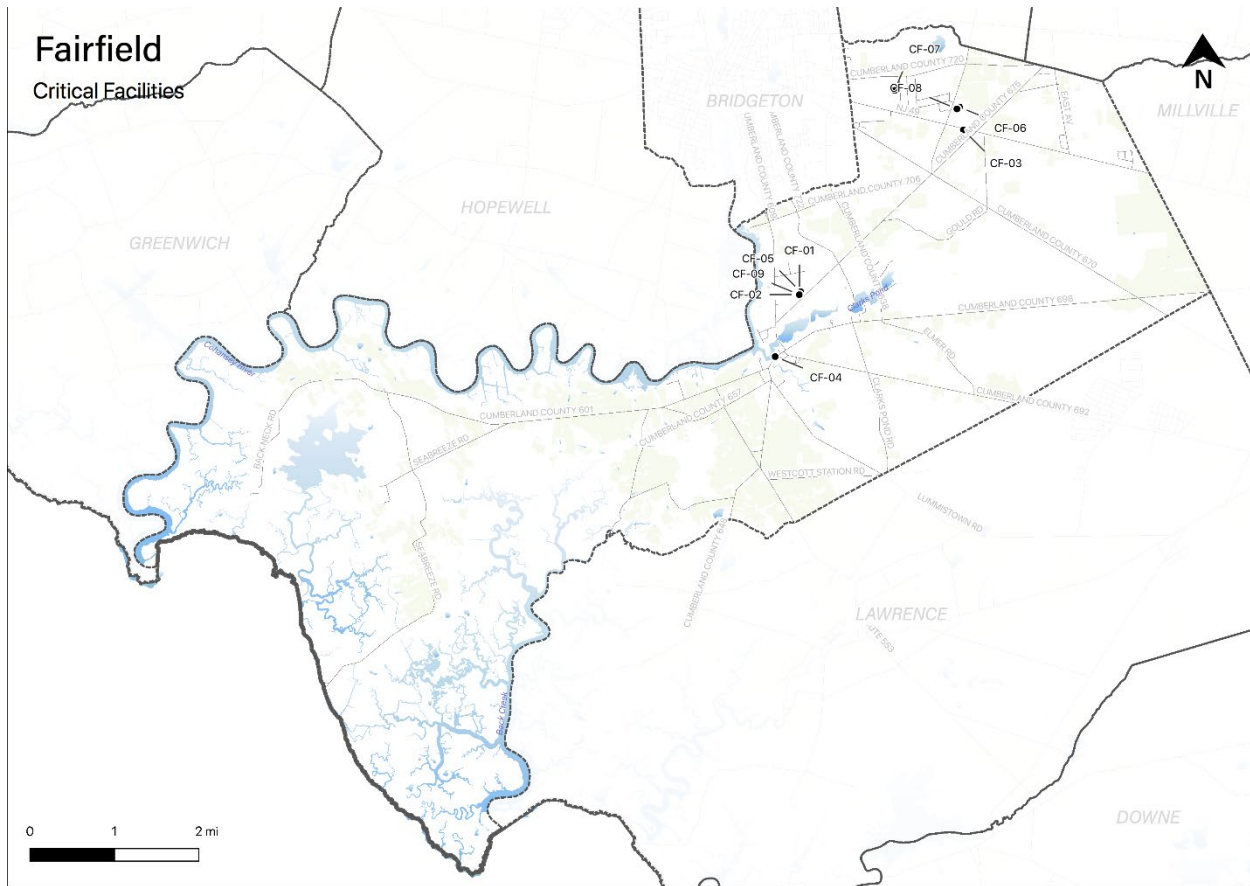
**Part 3: Hazard Identification and Risk Assessment**

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CF #	Name	Type	Sub-Type	Address	Co-located CF #	Shelter (Y/N)	Generator (Y/N)	Comments	Mitigation Measure #
CF-7	Sewer Pump Station	Utilities – Wastewater	Pump Stations / Lift Stations	Longview Drive, Bridgeton		N/A	N		M-8
CF-8	Fairfield Township School	Schools	Public Schools	375 Gouldtown-Woodruff Road, Bridgeton	CF-6	N	Y		M-9
CF-9	Senior Center	Vulnerable Populations Facilities	Senior Centers	68 Fairton Gouldtown Road, Bridgeton		Y	N	Potential use as shelter / warming & cooling center	M-10

## Part 3: Hazard Identification and Risk Assessment

Figure 6-4: Fairfield Township Critical Facilities



### Part 3.4: Hazard Exposure Assessment

Hazard exposure assessments were for the eleven (11) natural hazards identified in the CC HMPU Base Plan<sup>12</sup>.

Key results for Fairfield Township are depicted in the following.

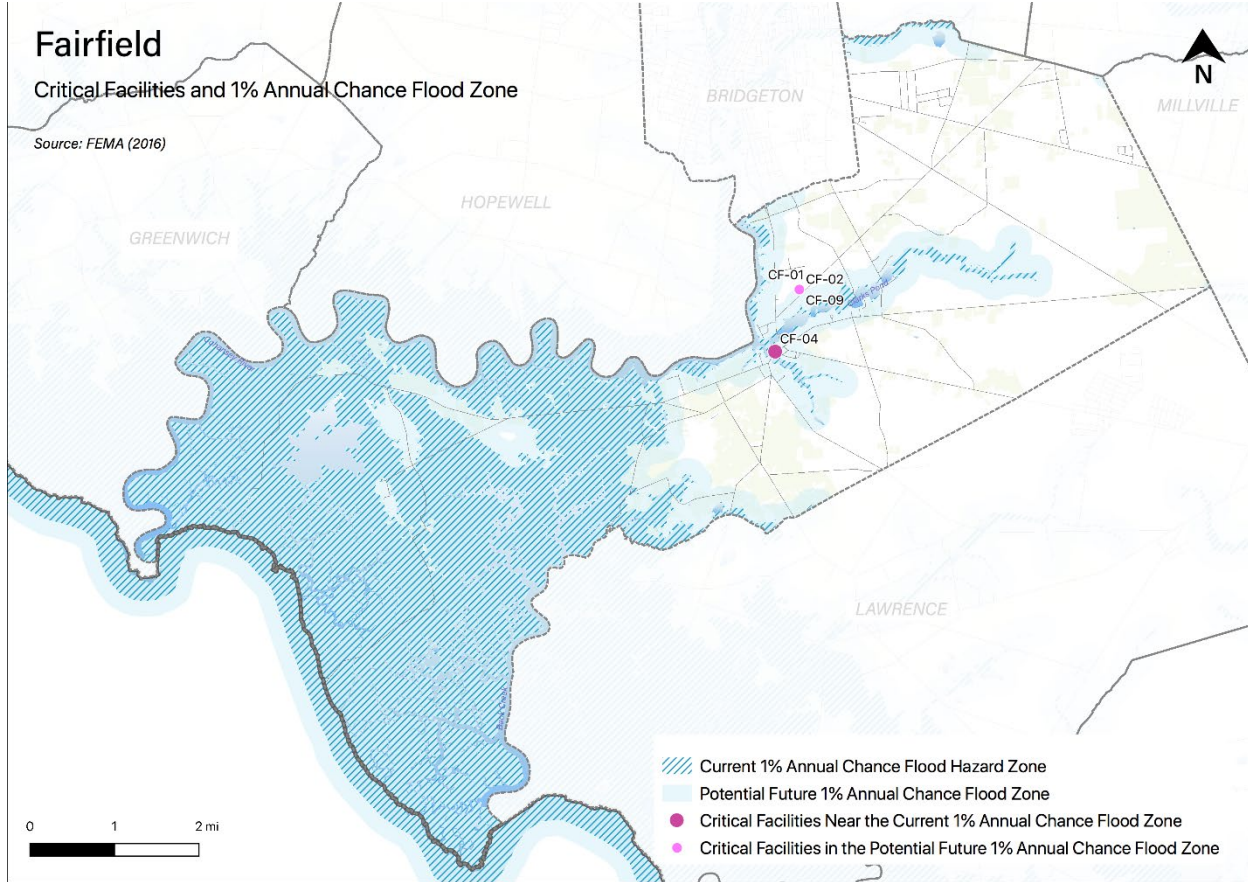
**Mapping:** Figure 6-5 is illustrative of the type of mapping available as a result of the hazard exposure assessment. This figure shows critical facilities that are located in or near (i.e., within 500 feet) the 1% annual flood zone on FEMA's Flood Insurance Rate Maps (FIRMs) or within a potential future 1% annual chance flood zone (i.e., within 1,000 feet).

<sup>12</sup> Hazard profiles are included for all eleven natural hazards in *Section 3: Hazard Identification and Risk Assessment* of the CC HMPU Base Plan.



## Part 3: Hazard Identification and Risk Assessment

Figure 6-5: Fairfield Township Critical Facilities and 1% Annual Chance Flood Zone



Mapping results are available for general building stock and critical facilities for the following hazards:<sup>13</sup>

- Coastal Erosion & Sea Level Rise
- Earthquake
- Extreme High Temperature
- Flood - per FEMA FIRM mapping
- High Wind and Severe Weather (heavy summer rains and winter snow loads)
- Wildfire

Tabulations: Selected data culled from the hazard exposure assessment process is displayed in the following tables:

- Table 6-5 indicates hazard exposure for general building stock
- Table 6-6 indicates hazard exposure for critical facilities

<sup>13</sup> All mapping corresponding to results described in Parts 3.3 through 3.5 can be viewed in .pdf format at: <https://www.dropbox.com/sh/6b2p3ujhnpaotq/AAAY4t5I79KNziVZHjGdtZvBa?dl=0>.

**Part 3: Hazard Identification and Risk Assessment**

**Table 6-5: Fairfield Township General Building Stock Hazard Exposure**

Hazard	Number of Exposed Buildings	Percent of Total Buildings in the Jurisdiction	Value of Exposed Buildings	Percent of Total Value in the Jurisdiction
Coastal Erosion <sup>14</sup>	0	N/A	0	N/A
Sea Level Rise - 3 feet increase	31	1.04%	\$1,665,267	0.44%
Flood - Within 1 % Annual Chance Zone	111	4%	\$5,855,367	2%
Flood - Near (within 500 feet) of 1% Annual Chance Zone	487	16%	\$48,130,633	12%
Earthquake – Structure built before 1927 <sup>15</sup>	319	15%	\$31,053,700	13%
High Winds / Severe Weather – Structure built before 1975	1,546	72%	\$156,212,600	65%
Wildfire – Composite score > 2.5 <sup>16</sup>	29	0.97%	\$2,125,600	0.56%

**Table 6-6: Fairfield Township Critical Facilities Hazard Exposure<sup>17</sup>**

Hazard	Number of Critical Facilities	CF #s
Coastal Erosion	None	N/A
Sea Level Rise	None	N/A
Flood - Within 1 % Annual Chance Zone	None	N/A
Flood - Near (within 500 feet) of 1% Annual Chance Zone	1	CF-4
Flood – Future potential (within 1,000 feet) 1% Annual Chance Zone	4	CF-01, CF-02, CF-04, CF-09
Wildfire	9	CF-01, CF-02, CF-03, CF-04, CF-05, CF-06, CF-07, CF-08, CF-09

In addition, all critical facilities in Cumberland County are exposed to the following hazards and potentially subject to power outages, and structural and/or contents damage:

- Earthquake
- Extreme Temperatures
- High Winds
- Severe Weather – Summer (including heavy rains)
- Severe Weather – Winter (including heavy snow loads)

<sup>14</sup> All supporting data for Coastal Erosion, Sea Level Rise (3-foot rise), Flood (all) can be viewed at [https://docs.google.com/spreadsheets/d/1fcN5hL3Jz4X7mldFyKs6wol6J6lAR9bSsvJPIgE\\_A0Q/edit?usp=sharing](https://docs.google.com/spreadsheets/d/1fcN5hL3Jz4X7mldFyKs6wol6J6lAR9bSsvJPIgE_A0Q/edit?usp=sharing)

<sup>15</sup> All supporting data for Earthquake, High Winds, and Severe Weather can be viewed at <https://docs.google.com/spreadsheets/d/1Zx1LZwKQ8esqdv4c9hbbSZurtMjH4UITQWJY1LrZezc/edit?usp=sharing>

<sup>16</sup> All supporting data for Wildfire can be viewed at [https://docs.google.com/spreadsheets/d/1JAbfd3A-eCHI93pZFaPVuM\\_H2yvuUzeHCmoijv-oxsw/edit?usp=sharing](https://docs.google.com/spreadsheets/d/1JAbfd3A-eCHI93pZFaPVuM_H2yvuUzeHCmoijv-oxsw/edit?usp=sharing)

<sup>17</sup> All supporting data for critical facility hazard exposure can be viewed at <https://docs.google.com/spreadsheets/d/1MPLiOANm7fHoyKuxyWqyang26LTSPayTxJvLmK5lGPg/edit?usp=sharing>



### Part 3: Hazard Identification and Risk Assessment

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Information from the 2016 NJ4 HMP HIRA was also reviewed with the Working Group to determine the need for updates to hazard exposure results for Dam and Levee Failure.

#### Dam Failure

Per the New Jersey Department of Environmental Protection (NJDEP) data<sup>18</sup>:

- There is one (1) Significant Hazard" dam located in the Township:
  - Mill Dam on a Cohansey River tributary
- No (0) dam failure incidents had been recorded in the Township as of 2014

#### Levee Failure

Per the South Jersey Levee Inventory<sup>19</sup>:

- There are five (5) levees in the Township with a total of forty-one (41) parcels within a 1,000-foot buffer of the levees:
  - Sea Breeze Road (NCRS #60)
  - Private landowner (NCRS #61)
  - Back Neck 1 (NCRS #62)
  - Back Neck 2 (NCRS #63)
  - Rock Creek (NCRS #64)
- No (0) levee failure incidents had been recorded in the Township as of 2014

Working Group members were asked the following questions for Dam and Levee Failure:

- ✓ *Are these facilities still in operation?*
- ✓ *Are there updated Emergency Action Plans or inundation maps for these facilities?*
- ✓ *Have there been any other incidents of failure since the reported records?*

Per the Fairfield Township Working Group, there were no changes to the NJ4 HMP HIRA Dam and Levee Failure hazard exposure results.

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<sup>18</sup> (1) NJDEP Dam Safety and Flood Control (Dam Locations); (2) NJDEP Land Use / Land Cover; (3) US Census Bureau 2010 Census

<sup>19</sup> US Department of Agriculture, National Resources Conservation Services (NRCS) South Jersey Levee Inventory, 2010.

### Part 3: Hazard Identification and Risk Assessment

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#### National Flood Insurance Program Information

One additional metric discussed with the Working Group was statistical information from the National Flood Insurance Program (NFIP)<sup>20</sup>. The following are relevant numbers for Fairfield Township as provided by the New Jersey Office of Emergency Management (NJOEM)<sup>21</sup>:

- Active Policies – twelve (12) active NFIP flood insurance policies
- Claims History – eighteen (18) claims made against the NFIP between 1979 and 2019
- Repetitive Loss Properties (RL) – three (3) properties designated as RL

For comparison relative to the number of active NFIP flood insurance policies, the following are the number of potentially exposed buildings (per Table 6-5), which are higher than the number of active policies:

- Flood - Within 1 % Annual Chance Zone: 111 buildings ~ 4% of total buildings, with a value of \$5,855,367 ~ 2% of the total building value in the Township.
- Flood - Near (within 500 feet) of 1% Annual Chance Zone: 487 buildings ~ 16% of total buildings, with a value of \$48,130,633 ~ 12% of the total building value in the Township.

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<sup>20</sup> Information on the NFIP is described in *Section 3: Hazard Identification and Risk Assessment* of the CC HMPU Base Plan.

<sup>21</sup> Spreadsheets provided by NJOEM in October 2021.

## Part 3: Hazard Identification and Risk Assessment

### Part 3.5: Demographic Considerations

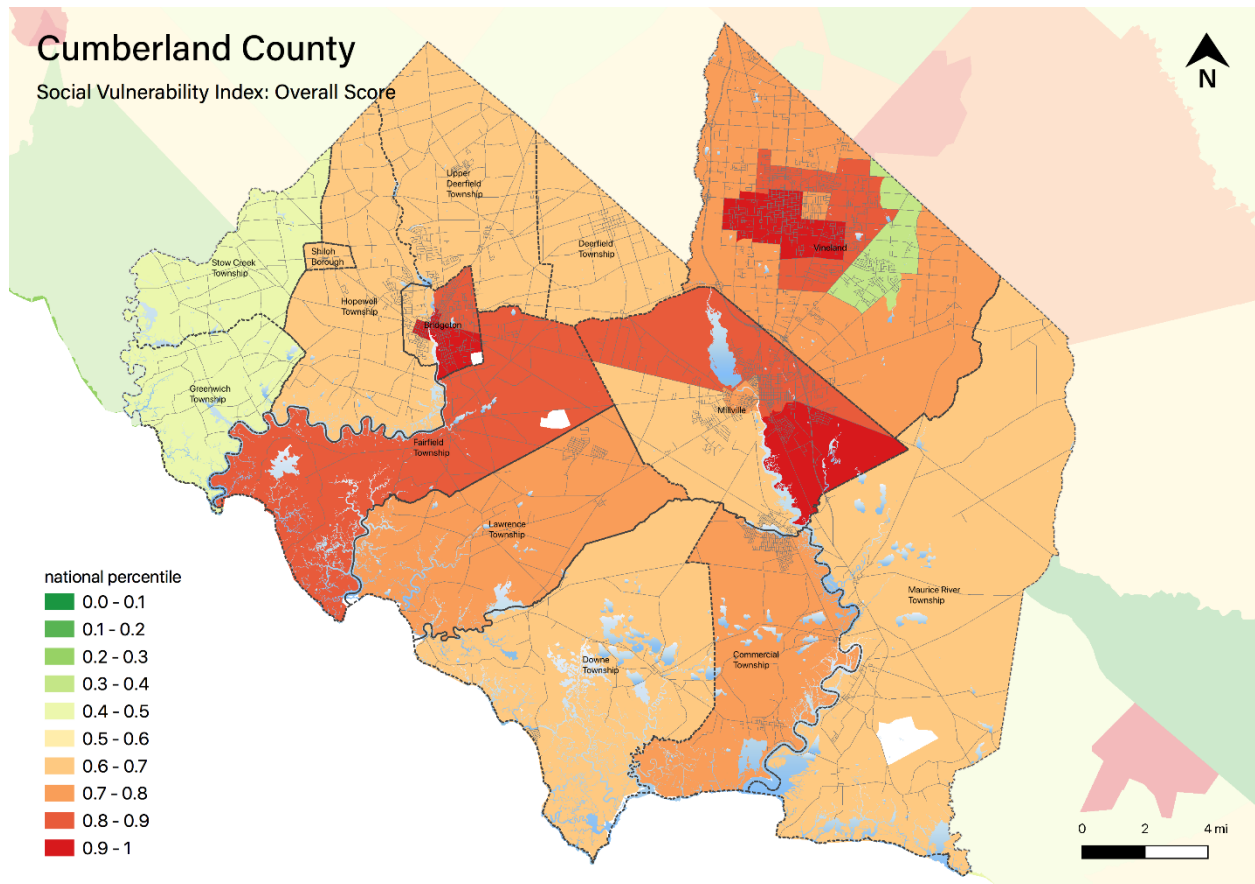
Demographic considerations include general population and land use factors. Table 6-7 includes current population estimates and changes since the previous US Census<sup>22</sup>:

**Table 6-7: Fairfield Township General Population Demographics**

Metric	Current Estimates
2010 Population	6,295
2019 Population	6,090
Percent Population Change (2010-2019)	- 3.26%
Land Area	41.26 sq. miles
Population Density	147.6 / sq. mile

Demographic considerations also include differences in social vulnerability<sup>23</sup>. Figure 6-6 shows the overall Social Vulnerability (SVI) Index overall scores for Cumberland County.

**Figure 6-6: Cumberland County Social Vulnerability Index: Overall Scores**



<sup>22</sup> US Census, 2019 ACS 5 Year Estimates, Table ID DP5

<sup>23</sup> Social vulnerability considerations are described in *Section 3: Hazard Identification and Risk Assessment* of the CC HMPU Base Plan.

### Part 3: Hazard Identification and Risk Assessment

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For Fairfield Township, Table 6-8 includes selected metrics where social vulnerability considerations are noteworthy when compared with all national census tracts:

**Table 6-8: Fairfield Township Social Vulnerability Considerations<sup>24</sup>**

Metric	Comparison with all National Census Tracts
Percentage of persons: With a disability	Higher than 77%
Percentage of persons: Leading a household as a single parent	Higher than 78%
Percentage of persons: Identifying as racial or ethnic minorities	Higher than 72%

In addition, the percentage of residents earning below poverty level = 13.4% (compared with the average in New Jersey of 10.4%).

#### Part 3.6: Observations

- Outreach and guidance should be provided for residents, business owners, and property owners for:
  - Properties in or near sea level rise, flood zones, or wildfire hazard areas.
  - Older buildings to help evaluate potential risk of damage due to hazards such as Earthquake, High Winds, and Severe Winter Weather (i.e., heavy snow loads).
- All critical facilities are potentially vulnerable to Earthquake, High Winds, and Severe Weather (heavy rains in summer and snow loads in winter).
- A few critical facilities are potentially vulnerable to Flood and Wildfire and will be identified as priorities for follow-up critical facility field evaluations.
- Priority for follow-up should also be focused on critical facilities housing vulnerable populations related to Extreme Temperature and Severe Weather hazards. For example, determining and documenting (cross referencing EOP) how residents will be moved to facilities providing shelter including cooling and warming centers (all of which would need adequate back-up power and hardening).

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<sup>24</sup> All supporting data for SVI can be viewed at [https://docs.google.com/spreadsheets/d/10zb\\_Qlg2CqGxb45\\_fcKiP46swaC16-fORxYTIOiAkP0/edit#gid=1481479799](https://docs.google.com/spreadsheets/d/10zb_Qlg2CqGxb45_fcKiP46swaC16-fORxYTIOiAkP0/edit#gid=1481479799)

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## Part 3: Hazard Identification and Risk Assessment

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### Part 3.7: Hazard Priorities

As a key step in the Hazard Identification and Risk Assessment (HIRA) process, the eleven (11) natural hazards identified in the CC HMPU Base Plan were discussed during the Municipal Working Group Work Sessions and the relative priority of these hazards was identified.

Based on their personal experience as well as the results of the HIRA, the Municipal Working Group rated the hazards as follows:

#### High Priority

- Coastal Erosion & Sea Level Rise
- Dam Failure
- Drought
- Extreme Temperature: Cold & Hot
- Flood
- Severe Weather – Summer
- Severe Storm – Winter Weather
- Wildfire

#### Moderate Priority

- High Wind

#### Low Priority

- Earthquake

One additional hazard was identified but was not considered applicable to the municipality:

- Levee Failure

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## Part 4: Mitigation Measures

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### Part 4: Mitigation Measures

Part 4 includes six subparts:

- *Part 4.1: Mitigation Goals and Strategy*
- *Part 4.2: NJ4 HMP Mitigation Measures*
- *Part 4.3: Municipal Mitigation Measures – Identification*
- *Part 4.4: Municipal Mitigation Measures – Implementation*
- *Part 4.5: Multi-Jurisdictional Mitigation Measures*
- *Part 4.6: Authorities, Policies, Programs, Resources, and Plan Integration*

#### Part 4.1: Mitigation Goals and Strategy

Goals were originally established by the SDVR Hazard Mitigation Steering Committee and validated by the four County Hazard Mitigation Working Groups in response to risk and capability assessment results.

As part of the NJ4 HMP plan update process, these goals were reviewed and edited by the Municipal Working Groups for use in the Municipal Appendices. In addition, the Municipal Working Groups for the CC HMPU reviewed and reaffirmed these goals for continued use in the Appendices.

All mitigation measures in the Municipal Appendix are related to at least one of these four goal statements.

- **Goal 1: Improve education and outreach efforts** regarding potential risk of natural hazards and appropriate mitigation measures that can be used to reduce risk (including programs, activities, and projects)
- **Goal 2: Improve data collection, use, and sharing** to reduce the risk of natural hazards
- **Goal 3: Improve capabilities and coordination** at municipal, county, and state levels to plan and implement hazard mitigation measures
- **Goal 4: Plan and implement projects** to mitigate identified natural hazards, known problems, and areas of concern

Based on these goals, the results of the HIRA, and experience of participants in the plan update process, the Municipal Working Group identified an overarching strategy for mitigation:

- Identify and address known problems or areas of concern for critical facilities and vulnerable populations
- Provide opportunities for residents and property owners to access available information about risk reduction and mitigation measures, e.g., useful links added to municipal websites, in particular for Repetitive Flood Loss properties
- Institutionalize hazard mitigation into municipal activities and programs through regular interactions of the Municipal Working Group and integration of related regulatory programs and planning initiatives
- Stay informed regarding changing conditions and related improvements in hazard and risk data due to future natural hazard events and increasing understanding of the effects of climate change and use the information as part of periodic evaluations of and refinements or additions to the municipality's mitigation program

The mitigation measures described in Parts 4.3 through 4.5 of the Municipal Appendix reflect this strategy.

## Part 4: Mitigation Measures

### Part 4.2: NJ4 HMP Mitigation Measures

Known problems and areas of concern were the basis for mitigation measures identified in the NJ4 HMP. In cases where these problems and concerns still exist at the time of the CC HMPU, the related NJ4 HMP mitigation measures were candidates for inclusion in the Municipal Appendix.

Table 6-9 identifies the status of mitigation measures included in the NJ4 HMP. These entries were based on information provided by the Municipal Working Group. In some cases, the NJ4 HMP mitigation measures were carried over as part of the Municipal Appendix as indicated in the “Comments” column and the far right-hand column of Table 6-9.

**Table 6-9: Status of Fairfield Township NJ4 HMP Mitigation Measures**

Mitigation Action, Program, or Project	Status	Comments	Mitigation Measure # <sup>25</sup> <sub>26</sub>
<b>M-1:</b> Identify and pursue outreach and education opportunities to inform municipal residents, businesses, and property owners.	Work-in-progress	Work-in-progress included: <ul style="list-style-type: none"> <li>▪ Use of Township website for emergency or hazard information dissemination,</li> <li>▪ Follow-up with facilities regarding projects</li> <li>▪ Informal discussions among Township officials</li> </ul>	Carried over as part of M-1
<b>M-2:</b> Prioritize critical facilities and complete site and facility surveys to identify vulnerabilities and potential mitigation measures.			
<b>M-3:</b> Prioritize recurrent drainage problem areas and initiate data collection to track unreimbursed damages and related response and recovery expenses.			
<b>M-4:</b> Conduct regular Municipal Working Group meetings.			
<b>M-5:</b> Update fire water supply plan to include identifying current capabilities, available resources, and potential needs for Fairfield Township.	Not completed, not funded		Carried over as M-2
<b>M-6:</b> Purchase notification sign board (solar powered).	Not completed, not funded		Carried over as M-3
<b>M-7:</b> Install permanent back-up emergency power generator at Township Hall / EOC (CF-1 / CF-2).	Completed	Completed in 2018 using HMGP funds from Superstorm Sandy <sup>27</sup> .	N/A
<b>M-8:</b> Install permanent back-up emergency power generator at Gouldtown Fire Company (CF-3).	Not completed, not funded	Potential facility for mobile generator hook-up.	Carried over as M-4

<sup>25</sup> Detailed information for identification and implementation of municipal (M-#) mitigation measures is included in Tables 6-10 and 6-11.

<sup>26</sup> Detailed information for identification and implementation of multi-jurisdictional (MJ-#) mitigation measures is included in Table 6-12.

<sup>27</sup> Cumberland County Round 1 Generator Program.

## Part 4: Mitigation Measures

Mitigation Action, Program, or Project	Status	Comments	Mitigation Measure # <sup>2526</sup>
<b>M-9:</b> Install permanent back-up emergency power generator at Fairton Fire and Rescue Company (CF-4).	Not completed, not funded	Same as M-8	Carried over as M-5
<b>M-10:</b> Install permanent back-up emergency power generator at Public Works Facility (CF-5).	Work-in-progress	Same as M-8, Also, looking at seeing if Township Hall generator can run Public Works facility.	Carried over as M-6
<b>M-11:</b> Install permanent back-up emergency power generator at Water Tower (CF-6).	Not completed, not funded	Same as M-8	Carried over as M-7
<b>M-12:</b> Install permanent back-up emergency power generator at Pump Station located on Longview Drive (CF-7).	Not completed, not funded	Same as M-8	Carried over as M-8
<b>M-13:</b> Install permanent back-up emergency power generator at Fairfield Township School (CF-8).	Work-in-progress	School is currently pursuing grants/funding to secure a generator.	Carried over as M-9
<b>M-14:</b> Install permanent back-up emergency power generator at Senior Center (CF-9).	Work-in-progress	Same as M-8	Carried over as M-10
<b>M-15:</b> Install retaining wall at Fairton Fire and Rescue Company to lessen flooding from adjacent Cohansey River.	Not completed, not funded		Carried over as M-11
<b>M-16:</b> Elevate Sea Breeze Road from Garrison Lane to Keystone Avenue.	Not completed, not funded		Carried over as M-12
<b>M-17:</b> Elevate Husted-Landing Road and install roadside protective measures against erosion and flooding.	Not completed, not funded		Carried over as M-13
<b>M-18:</b> Address identified Repetitive Flood Loss Properties.	Work-in-progress	As of November 2021, of three properties listed as RL, one is not occupied and has been acquired by the State of NJ and the other two are still owner-occupied.	Carried over as M-14
<b>M-19:</b> Establish safety zones for around critical facilities in or near wildfire risk areas.	Work-in-progress	The Township is currently working with the Fire Company.	Carried over as M-15
<b>MJ-1:</b> Retaining wall at Mill Dam on County Route 609 (Bridgeton Fairton Road). Also in the City of Bridgeton.	Not currently considered a problem area.	Road is currently closed by the County and access to bridge is eliminated since January 2021. Not considered a substantial impediment for EMS / Fire access.	N/A



## Part 4: Mitigation Measures

### Part 4.3: Municipal Mitigation Measures – Identification

Table 6-10 includes the list of mitigation measures that are considered the responsibility of the municipality. These mitigation measures:

- Reflect the goals and strategy identified in Part 4.1
- Include projects carried over from NJ4 HMP as detailed in Part 4.2
- Include new projects, programs or activities identified by the Municipal Working Groups including measures to address known problems or areas of concern for critical facilities and vulnerable populations
- Address Repetitive Flood Loss (RL) and Severe Repetitive Flood Loss Properties (SRL)<sup>28</sup> if applicable

Table 6-10 includes:

- Brief description of the mitigation action, program, or project
- Hazard(s) addressed by the measure
- Relevant goal(s) addressed by the measure
- Whether the measure pertains to existing or new structures or both

**Table 6-10: Fairfield Township Municipal Mitigation Measures Identification**

#	Mitigation Action, Program, or Project	Hazard(s)	Goal (s)	Existing or New Structures
M-1	<p><u>Township Mitigation Program</u> – including sustained efforts in cooperation with Cumberland County Office of Emergency Management (CC OEM) to:</p> <ul style="list-style-type: none"> <li>▪ Conduct outreach and education for residents, businesses, and property owners</li> <li>▪ Complete critical facility field evaluations to identify potential vulnerabilities and mitigation measures</li> <li>▪ Compile relevant data regarding hazard impacts</li> <li>▪ Support regular interactions of the Township Working Group</li> <li>▪ Seek integration of hazard mitigation with other parallel planning initiatives</li> </ul>	All	Goal #s 1, 2, and 3	All
M-2	Update fire water supply plan to include identifying current capabilities, available resources, and potential needs for Fairfield Township.	All	Goal #3	Existing
M-3	Purchase notification sign board (solar powered).	All	Goal #4	Existing

<sup>28</sup> Section 3: Hazard Identification and Risk Assessment of the CC HMPU Base Plan includes a description of RL and SRL properties.

## Part 4: Mitigation Measures

#	Mitigation Action, Program, or Project	Hazard(s)	Goal (s)	Existing or New Structures
M-4	Install permanent back-up emergency power generator at Gouldtown Fire Company (CF-3)	Power outage due to multiple hazard types.	Goal #4	Existing
M-5	Install permanent back-up emergency power generator at Fairton Fire and Rescue Company (CF-4).	Power outage due to multiple hazard types.	Goal #4	Existing
M-6	Install permanent back-up emergency power generator at Public Works Facility (CF-5).	Power outage due to multiple hazard types.	Goal #4	Existing
M-7	Install permanent back-up emergency power generator at Water Tower (CF-6).	Power outage due to multiple hazard types.	Goal #4	Existing
M-8	Install permanent back-up emergency power generator at Pump Station located on Longview Drive (CF-7).	Power outage due to multiple hazard types.	Goal #4	Existing
M-9	Install permanent back-up emergency power generator at Fairfield Township School (CF-8).	Power outage due to multiple hazard types.	Goal #4	Existing
M-10	Install permanent back-up emergency power generator at Senior Center (CF-9).	Power outage due to multiple hazard types.	Goal #4	Existing
M-11	Install retaining wall at Fairton Fire and Rescue Company to lessen flooding from adjacent Cohansey River	Flood	Goal #4	Existing
M-12	Elevate Sea Breeze Road from Garrison Lane to Keystone Avenue.	Flood	Goal #4	Existing
M-13	Elevate Husted-Landing Road and install roadside protective measures against erosion and flooding.	Flood	Goal #4	Existing
M-14	Address identified Repetitive Flood Loss Properties.	Flood	Goal #4	Existing
M-15	Establish safety zones for around critical facilities in or near wildfire risk areas.	Wildfire	Goal #4	Existing

## Part 4: Mitigation Measures

### Part 4.4: Municipal Mitigation Measures – Implementation

Table 6-11 includes information identified by the Municipal Working Group:

- Part(ies) responsible for following up with implementation of the measure
- Priority for implementation considering a range of criteria<sup>29</sup>
- Project Type to help determine funding options and implementation mechanisms at the municipal level<sup>30</sup>
- Estimated Cost, including estimates provided by the Municipal Working Group or approximate ranges for projects that are in early stages of development
- Target Date, indicating desired completion dates assuming availability of funding
- Next step(s) anticipated to implement the identified mitigation measures at the municipal level

**Table 6-11: Fairfield Township Municipal Mitigation Measures Implementation**

#	Mitigation Action, Program, or Project	Responsible Part(ies)	Priority	Project Type	Estimated Cost (\$)	Target Date	Next Step(s)
M-1	Township Mitigation Program	Township OEM and Township Working Group	High	Program	Staff Time	On-going, sustained effort	<ul style="list-style-type: none"> <li>▪ Identify outreach and education objectives and methods (working with CC OEM)</li> <li>▪ Set priorities (if necessary) and conduct critical facility field evaluations</li> <li>▪ Identify schedule for plan updates (including sustained public participation and plan integration efforts)</li> </ul>
M-2	Update fire water supply plan to include identifying current capabilities, available resources, and potential needs for Fairfield Township.	Township OEM and Fire Department	Moderate	Capabilities and Coordination	< \$50K	Three to five years	<ul style="list-style-type: none"> <li>▪ Conduct project scoping.</li> <li>▪ Identify funding source(s).</li> </ul>
M-3	Purchase notification sign board (solar powered).	Township OEM	Moderate	Equipment purchase	\$40,000 <sup>31</sup>	One to three years	<ul style="list-style-type: none"> <li>▪ Conduct project scoping.</li> </ul>
M-4	Install permanent back-up emergency power generator at Gouldtown Fire Company (CF-3)	Township OEM and Fire Department	High	Back-up Emergency Power Generator	< \$100K	One to three years	<ul style="list-style-type: none"> <li>▪ Conduct project scoping.<sup>32</sup></li> <li>▪ Identify funding source(s).</li> </ul>

<sup>29</sup> Section 4: Mitigation Measures of the CC HMPU Base Plan includes a description of evaluation criteria considered by the Municipal Working Group.

<sup>30</sup> Section 4: Mitigation Measures of the CC HMPU Base Plan includes a description of project types and related information regarding funding options and implementation mechanisms.

<sup>31</sup> Project estimated cost provided by Fairfield Township.

<sup>32</sup> Project scoping for M-4 through M-8, and M-10 to include determining feasibility to install hookups and transfer switch for using portable generator(s) to accommodate need, at least as a temporary measure

## Part 4: Mitigation Measures

#	Mitigation Action, Program, or Project	Responsible Part(ies)	Priority	Project Type	Estimated Cost (\$)	Target Date	Next Step(s)
M-5	Install permanent back-up emergency power generator at Fairton Fire and Rescue Company (CF-4).	Township OEM and Fire Department	High	Back-up Emergency Power Generator	< \$100K	One to three years	Same as M-4
M-6	Install permanent back-up emergency power generator at Public Works Facility (CF-5).	Township OEM and Public Works Department	Moderate	Back-up Emergency Power Generator	< \$100K	One to three years	Same as M-4
M-7	Install permanent back-up emergency power generator at Water Tower (CF-6).	Township OEM and School Board	Moderate	Back-up Emergency Power Generator	< \$100K	One to three years	Same as M-4
M-8	Install permanent back-up emergency power generator at Pump Station located on Longview Drive (CF-7).	Township OEM and Public Works Department	Moderate	Back-up Emergency Power Generator	< \$100K	One to three years	Same as M-4
M-9	Install permanent back-up emergency power generator at Fairfield Township School (CF-8).	Township OEM and School Board	Moderate	Back-up Emergency Power Generator	< \$100K	One to three years	<ul style="list-style-type: none"> <li>• Complete grant application process</li> <li>• Prepare RFP for supply and installation</li> </ul>
M-10	Install permanent back-up emergency power generator at Senior Center (CF-9).	Township OEM and Public Works Department	High	Back-up Emergency Power Generator	< \$100K	One to three years	Same as M-4
M-11	Install retaining wall at Fairton Fire and Rescue Company to lessen flooding from adjacent Cohanseey River	Township OEM and Public Works Department	High	Public Property Flood Mitigation	< \$100K	One to three years	<ul style="list-style-type: none"> <li>▪ Conduct project scoping.</li> <li>▪ Identify funding source(s).</li> </ul>
M-12	Elevate Sea Breeze Road from Garrison Lane to Keystone Avenue.	Township OEM and Public Works Department	Moderate	Private Property Flood Mitigation	< \$100K - \$500K	Three to five years	<ul style="list-style-type: none"> <li>▪ Conduct project scoping.</li> <li>▪ Identify funding source(s).</li> </ul>
M-13	Elevate Husted-Landing Road and install roadside protective measures against erosion and flooding.	Township OEM and Public Works Department	High	Private Property Flood Mitigation	< \$100K - \$500K	Three to five years	<ul style="list-style-type: none"> <li>▪ Conduct project scoping.</li> <li>▪ Identify funding source(s).</li> </ul>
M-14	Address identified Repetitive Flood Loss Properties.	Township OEM and Floodplain Administrator	High	Private Property Flood Mitigation	Staff time commitment	Six months	<ul style="list-style-type: none"> <li>▪ Prior to initiating landowner contacts, identify flood insurance implications and mitigation options including eligible activities per FEMA HMA programs.</li> <li>▪ Initiate landowner contact to discuss current risk and available options.</li> </ul>

## Part 4: Mitigation Measures

#	Mitigation Action, Program, or Project	Responsible Part(ies)	Priority	Project Type	Estimated Cost (\$)	Target Date	Next Step(s)
M-15	Establish safety zones for around critical facilities in or near wildfire risk areas.	Township OEM and Fire Department	Moderate	Public Property Wildfire Mitigation	Staff time commitment	One to three years	Conduct critical facility evaluations to identify facilities with potential wildfire risk.

The following are additional notes regarding the implementation of Mitigation Measure M-1 (consistent with *Part 3.6: Observations*):

- Outreach and guidance should be provided for owners of :
  - Properties with valid Repetitive Loss designations
  - Buildings potentially exposed to Coastal Erosion, Sea Level Rise, Dam Failure, Levee Failure, and/or Wildfire.
  - Buildings in or near the 1% annual flood zone regarding potential risk and availability of NFIP flood insurance.
  - Older buildings to help evaluate potential risk of damage due to hazards such as Earthquake, High Winds, and Severe Weather (heavy rains in summer and heavy snow loads in winter).
- Considerations for prioritizing and conducting critical facility field evaluations should include:
  - All CFs are potentially vulnerable to Earthquake, High Winds, and Severe Weather (heavy rains in summer and heavy snow loads in winter).
  - In addition, some CFs are potentially vulnerable to Flood and/or Wildfire and should also be considered as candidates for follow-up facility-level evaluations.
  - Priority for follow-up should also be focused on critical facilities housing vulnerable populations, e.g., group homes, related to Extreme Temperature and Severe Weather hazards. For example, determining and documenting (cross referencing the jurisdiction's Emergency Operations Plan) how residents will be moved to facilities providing shelter including cooling and warming centers (all of which would need adequate back-up power and hardening).
- Provisions for Plan Maintenance include :
  - Sustain public outreach and participation (including but not limited to targeted outreach and guidance efforts)
  - Conduct regular interactions of the Working Group to keep the plan current (e.g., an annual plan review and amendment process at a minimum)
  - Track and take advantage of plan integration opportunities including noting all upcoming plan updates as part of regular Working Group interactions

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## Part 4: Mitigation Measures

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### Part 4.5: Multi-Jurisdictional Mitigation Measures

During the Municipal Working Group Work Sessions, the Working Group identified some NJ4 HMP mitigation measures to be carried over, as well as adding new areas of concern, all of which were designated as multi-jurisdictional mitigation measures. Implementation of these measures, in the opinion of the Municipal Working Groups, requires participation or leadership from other levels of government, including county, state, and federal agencies. These multi-jurisdictional mitigation measures have been compiled in Table 6-12.

These measures have been referred to the County Working Group for consideration. As part of the implementation of the CC HMPU, the County Working Group will be working with the municipalities to:

- Confirm identified issues are valid multi-jurisdictional measures
- Identify specific responsibilities amongst different level(s) of government to address these problem areas
- Identify mitigation measures or related projects which may address the described problem areas that are already acknowledged as County responsibilities including identifying the appropriate County agency or department taking the lead role and status of implementing these mitigation measures
- Identify which, if any, additional mitigation measures the member agencies of the County Working Group will assume responsibility to implement

*Note: No new multi-jurisdictional mitigation measures were identified by the Fairfield Township Working Group.*

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## Part 4: Mitigation Measures

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### Part 4.6: Authorities, Policies, Programs, Resources, and Plan Integration

Part 4.6 includes three (3) subparts:

- Authorities, Policies, and Programs - Cross referencing relevant information and recommendations in the CC HMPU Base Plan regarding existing authorities, policies, and programs in the County and specific information about the Fairfield Township's participation and continued compliance in the National Flood Insurance Program (NFIP)
- Resources - Cross referencing relevant information and recommendations in the CC HMPU Base Plan regarding improving capabilities and coordination at the County and municipal level and specific information about Fairfield Township's available resources
- Plan Review and Integration – Identifying plans and programs included in the development of Plan Integration recommendations in the CC HMPU Base Plan

#### 4.6.1: Authorities, Policies, and Programs

*Section 4.6: Authorities, Policies, Programs, Resources, and Plan Integration* of the CC HMPU Base Plan summarizes relevant authorities, policies, and programs related to hazard mitigation in Cumberland County including the NFIP.

Continuing participation in the NFIP as part of the implementation of the CC HMPU includes:

- Involvement of Floodplain Manager / Administrator during the CC HMPU implementation process
- Commitment to adopt updated FIRMs (if appropriate) and evaluate / update the municipality's Flood Damage Prevention Ordinance as appropriate per recommendations included in Section 4.6 of the CC HMPU Base Plan and under Part 4.6.3: Plan Review and Integration of this Appendix.

#### 4.6.2: Resources

The update of the NJ4 HMP included reexamining participating jurisdictions' hazard mitigation and floodplain management capabilities; potential for improving capabilities and coordination within and between jurisdictions; and plan integration considerations, including:

- *Section 4: Mitigation Measures* of the CC HMPU Base Plan includes summary observations and recommendations concerning:
  - Capabilities for hazard mitigation planning and mitigation measure implementation and floodplain management for the participating jurisdictions
  - Coordination within municipal governments, between municipal governments and their communities, and between municipal, county, and state agencies responsible for hazard mitigation
- *Section 4.6: Authorities, Policies, Programs, Resources, and Plan Integration* of the CC HMPU Base Plan also includes summary statements regarding county and municipal resources and the impact of resource limitations on the overall approach to the CC HMPU mitigation strategies.

Table 6-12 compares the results of the Capability Assessment Survey for the County as a whole and Fairfield Township.

**Part 4: Mitigation Measures**

**Table 6-12: Fairfield Township Capability Assessment Survey Results**

Metric	Fairfield Township Results (n=5)	Cumberland County "as a whole" Results (n=85)
Position Type: <b>Full-time</b>	40.00%	51.76%
Position Type: <b>Part-time</b>	40.00%	36.47%
Position Type: <b>Volunteer</b>	20.00%	11.76%
<b>Time in Position:</b>		
Time in Position: <b>Less than 1 year</b>	20.00%	12.94%
Time in Position: <b>1 to 2 years</b>	20.00%	8.24%
Time in Position: <b>2 to 5 years</b>	20.00%	23.53%
Time in Position: <b>More than 5 years</b>	40.00%	55.29%
<b>Prior Experience:</b>		
Prior Experience: <b>None</b>	80.00%	57.65%
Prior Experience: <b>with hazard mitigation planning</b>	20.00%	31.76%
Prior Experience: <b>with HMA grant administration</b>	0.00%	12.94%
Prior Experience: <b>with floodplain management</b>	0.00%	7.06%
<b>Training / Certifications:</b>		
Training / Certifications: <b>None</b>	100.00%	75.29%
Training / Certifications: <b>for hazard mitigation planning and implementation</b>	0.00%	9.41%
Training / Certifications: <b>for floodplain management</b>	0.00%	15.29%

In general terms, when compared to the sampled individuals from across all the Working Groups, Fairfield Township has:

- Similar percentage of full-time staff
- Similar average time in current positions
- Lower percentage of staff with experience in hazard mitigation planning, HMA grant administration, and floodplain management
- Lower percentage of staff with training for hazard mitigation planning and implementation and floodplain management



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## Part 4: Mitigation Measures

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### 4.6.3: Plan Review and Integration

Section 4.6: *Authorities, Policies, Programs, Resources, and Plan Integration* of the CC HMPU Base Plan includes:

- Table BP.4-2 that identifies primary plans and documents collected from each of the participating municipalities.
- Includes results of reviewing primary plans and documents to determine the extent to which these documents reflect up-to-date hazard risk and mitigation.
- Includes recommendations for integrating the results of the CC HMPU, including hazard mitigation data, goals, measures, and/or recommendations with existing plans and programs at the municipal level that are relevant to all participating municipalities and incorporated by reference in each of the jurisdiction-specific Appendices

The plan maintenance process articulates and specifies a commitment to review and follow these recommendations during future scheduled updates of these various documents as considered appropriate by the Working Group and the governing body of the municipality.

Specific documents obtained during the plan update process from the Fairfield Township Working Group include:

- Flood Damage Prevention Ordinance (2016)
- Emergency Operations Plan (2013) Update scheduled in 2021
- Master Plan (2012)
- Master Plan Reexamination Report Update anticipated in 2022 (per ten-year review and reexamination cycle)
- Stormwater Management Plan (2006)
- Stormwater Control Ordinance (2021)
- Capital Improvement Budget (2020) Update scheduled in 2021
- Cumberland County Delaware Bayshore Recovery Plan (2013)

In addition, the following is status regarding the status of the Flood Damage Prevention Ordinance::

- Current version was adopted in 2016 and is consistent with the most recent FDPO per NJDEP]
- The Township Flood Map Official is the responsible party for enforcement. The Township Engineer was designated by the Working Group to serve as the Floodplain Administrator / Flood Map Official. The individual who currently holds that position is included on the Working Group and has completed the capability assessment survey.
- The document is accessible to the public via internet<sup>33</sup>.

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<sup>33</sup> <https://ecode360.com/33606968>

## Part 4: Mitigation Measures

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