



Salem County New Jersey  
Multi-Jurisdictional Multi-Hazard Mitigation Plan Update  
**Participating Jurisdiction Appendices**

**Appendix 6  
Lower Alloways Creek Township**

January 2025

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## Part 1: Overview

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### Part 1.1: Salem County Multi-Jurisdictional Multi-Hazard Mitigation Plan Update

The *Salem County Multi-Jurisdictional Multi-Hazard Mitigation Plan Update* (SC HMPU) incorporates input from participating jurisdictions in Salem County, including Salem County and 14 separate municipalities.

The SC HMPU is an update of the *Mitigation Plan for Four New Jersey Counties* (NJ4 HMP) that was completed by all 16 jurisdictions in Salem County along with over 70 additional jurisdictions from Camden, Cumberland, and Gloucester, Counties. The Salem County portions of the NJ4 HMP were adopted by the participating jurisdictions and approved by the Federal Emergency Management Agency in January 2017.

The SC HMPU has two main parts:

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

The Base Plan includes descriptions and information common to all 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 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: Lower Alloways Creek Township Municipal Appendix

This Municipal Appendix is focused on Lower Alloways Creek Township in Salem County, New Jersey.

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

## Part 2: Participation

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### 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.

Working Group meetings were conducted as both in-person and virtual meetings. Municipal Working Group members reviewed briefing materials and contributed during meetings and reviewed the Preliminary Draft and Public Review Draft versions of the SC HMPU Base Plan and Appendices. The Working Group will also continue to stay involved during the implementation and maintenance of the SC HMPU.

*Note: Four members of the Working Group also participated in the development of the 2017 NJ4 HMP. These members are indicated with an (\*) following their last names.*

**Table 6-1: Lower Alloways Creek 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>
Rick	Venable	Lower Alloways Creek Township Office of Emergency Management (OEM) / Police Department	OEM Coordinator	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Organized Working Group and Work Sessions.
Michael	DeParre	Lower Alloways Creek Township Police Department / OEM	Deputy OEM Coordinator	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Paul	Collier	Lower Alloways Creek Township Administration / Planning Board	Mayor / Member		<input checked="" type="checkbox"/>		
Ronald	Campbell*	Lower Alloways Creek Township Administration	Municipal Clerk		<input checked="" type="checkbox"/>		

<sup>1</sup> Project Kickoff Meeting was held on February 27, 2023.

<sup>2</sup> Round 1 Work Session was held on March 28, 2023.

<sup>3</sup> Round 2 Work Session was held on June 19, 2023.

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

## Part 2: Participation

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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>
Kevin	Clour*	Lower Alloways Creek Township Finance Department	CFO				
Justin	Fogg	Lower Alloways Creek Township Fire Department	Chief		<input checked="" type="checkbox"/>		
John	Palumbo* <sup>5</sup>	Lower Alloways Creek Township Construction	Construction Code Official / Floodplain Administrator				
Jack	Lynch	Lower Alloways Creek Township Public Works	Superintendent				
Dave	Ecret	Lower Alloways Creek Township Department of Public Works	Foreman				
Tim	Burns	Lower Alloways Creek Township Department of Public Works	Management Trainee				
Colleen	Cancila	Lower Alloways Creek Township Board of Education	Superintendent		<input checked="" type="checkbox"/>		
Kevin	Harris	Lower Alloways Creek Township Board of Education	Facilities Manager		<input checked="" type="checkbox"/>		
David	Burgin*	Emergency Services - PSEG Nuclear LLC	Emergency Preparedness				

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.

- Community / Faith-Based Organizations

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.

- Business Associations
- Environmental Organizations
- Healthcare Institutions
- Land Use / Economic Development Planner
- Non-Governmental Organizations

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<sup>5</sup> Also participates on Carneys Point Township Working Group.

## 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
March 8, 2023	Link to Project Website <sup>6</sup> established and maintained.	Township website <sup>7</sup>
May 16, 2023 et al	Public meeting conducted with "SC HMPU" as agenda item with Township Committee.	Township Hall
May 2023	Notice posted re: Preliminary Draft Appendix and Round 2 Working Group Meeting with link to Project Website.	Township website <sup>7</sup>
June 2023	Preliminary Draft Appendix available for public comment.	Project website <sup>6</sup>
August 1, 2023	Public outreach conducted during National Night Out event.	Police Department, Hancocks Bridge, NJ
August 15, 2023	Availability of Public Review Draft announced at Township Committee Meeting	Township Hall
August 16, 2023	Notice posted re: Public Review Draft Appendix review period with link to Project Website.	Township website <sup>7</sup>
August 18 through September 15, 2023	Public Review Draft Appendix available for public comment.	Project website <sup>6</sup>
July 8, 2024	Revised Draft Municipal Appendix posted to Project Website	Project website <sup>6</sup>
October 9, 2024 and November 14, 2024	Revised Draft Appendix Review Public Meetings (open to all County residents and interested parties)	PSEG Energy & Environmental Resource Center, Salem and Penn Towers South, Penns Grove
December 11, 2024	Final Municipal Appendix posted to Project Website	Project website <sup>6</sup>

Public comments and input received for all versions of the Municipal Appendix were considered by the Municipal Working Group and incorporated into the Municipal Appendix where appropriate. For example, the Hazard Rankings were increased for Flood from Moderate to High and High Wind from Low to Moderate in Part 3.7 as a result of the review process. 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>8</sup> In addition, public participation will continue to be encouraged during subsequent plan implementation and maintenance activities.<sup>9</sup>

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<sup>6</sup> <https://schmpu23.com/documents>

<sup>7</sup> <https://www.lowerallowayscreek-nj.gov/>

<sup>8</sup> See Mitigation Measure M-1 in Part 4 of the Municipal Appendix.

<sup>9</sup> Public education and outreach is described in *Section 4: Mitigation Measures* of the SC HMPU Base Plan.

## Part 3: Hazard Identification and Risk Assessment

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### Part 3: Hazard Identification and Risk Assessment

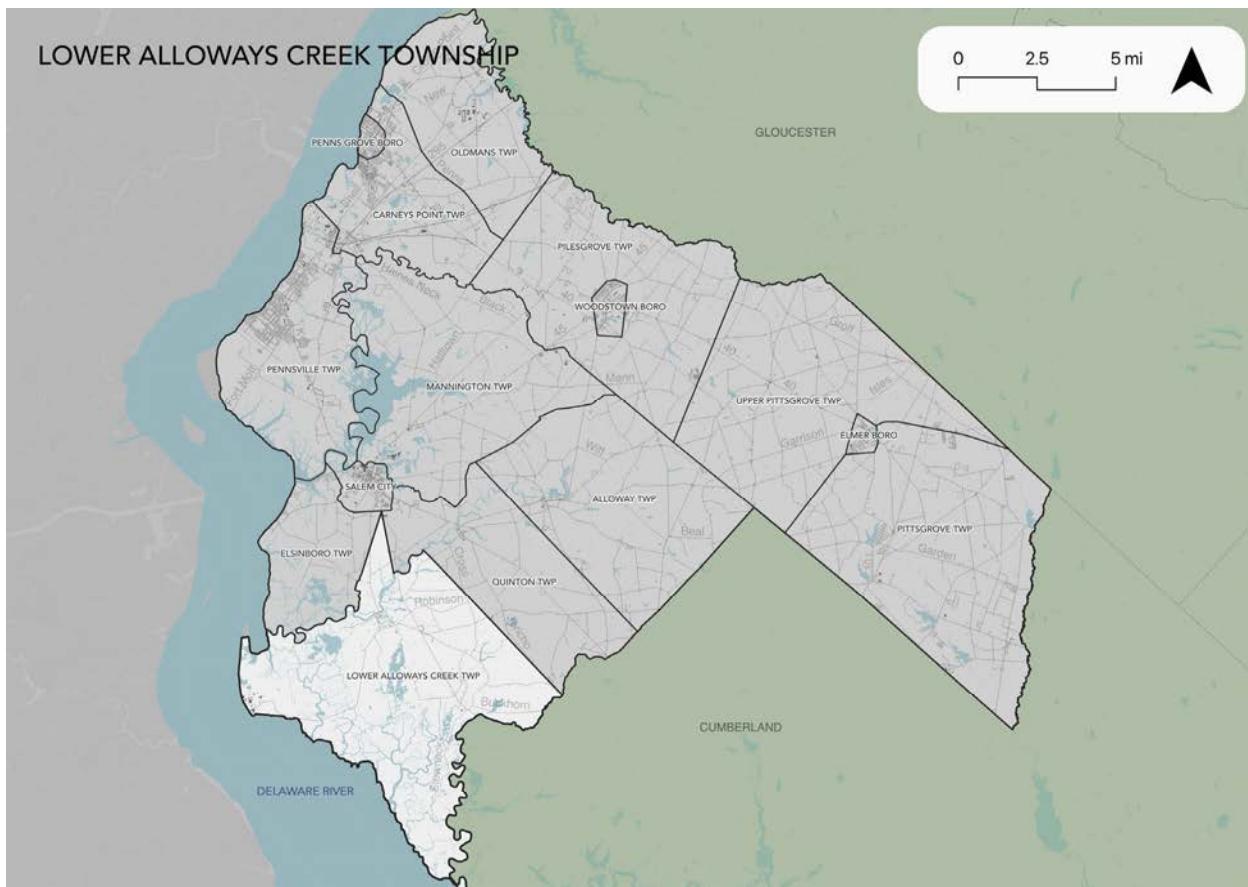
*Part 3 includes seven subparts:*

- *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

Lower Alloways Creek Township is located in the southwestern corner of Salem County (See Figure 6-1).

**Figure 6-1: Lower Alloways Creek Township Location Map**



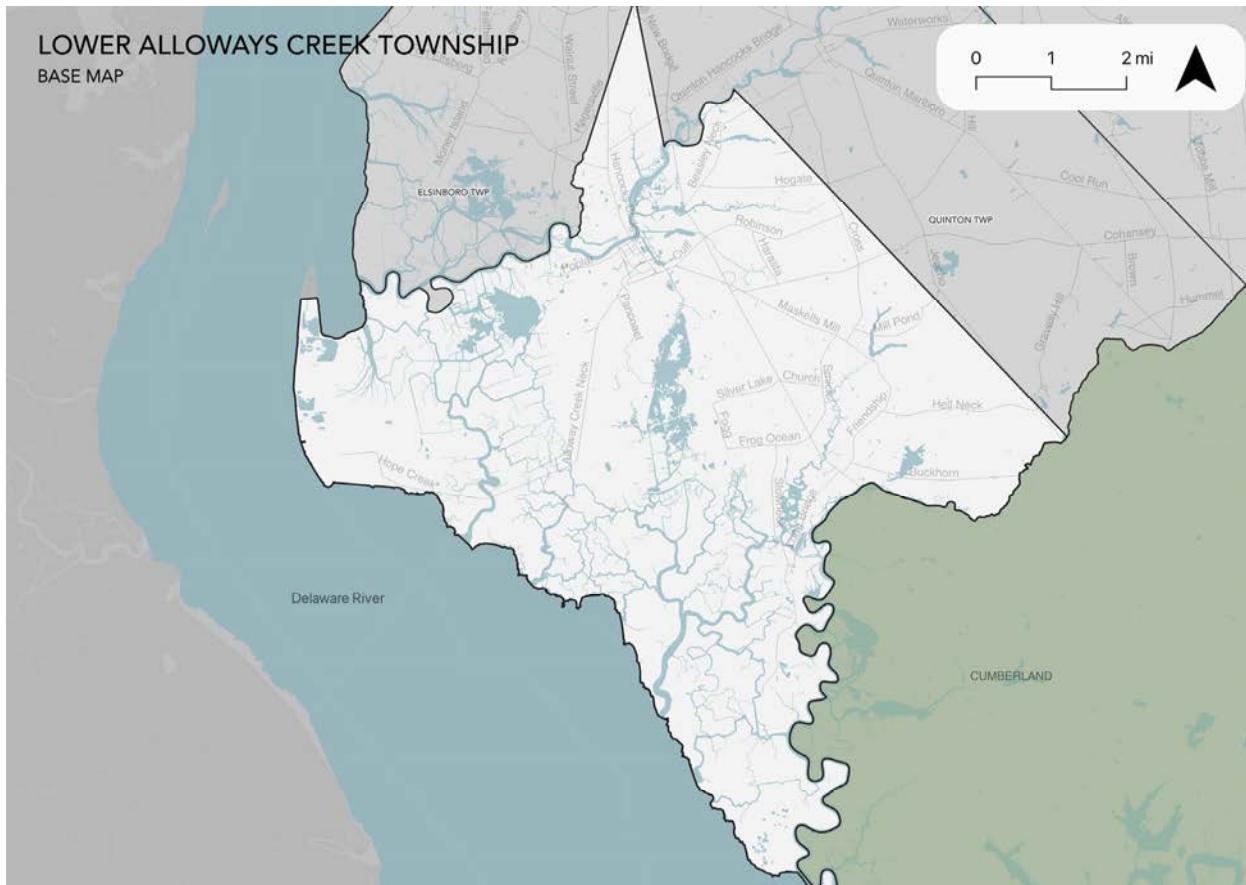
### Part 3: Hazard Identification and Risk Assessment

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Lower Alloways Creek Township is a rural residential community where more than a third of the area is water. Unincorporated communities in the municipality include Canton and Hancock's Bridge. PSEG operates three nuclear reactors within the Township.

Per Figure 6-2, the major water course includes the Delaware River. Major transportation routes include Salem County Routes 623 and 667. The land is predominantly flat and heavily covered in forests and wetlands.

**Figure 6-2: Lower Alloways Creek Township Base Map**



## Part 3: Hazard Identification and Risk Assessment

### Part 3.2: General Building Stock

As of 2021, there are 1,397 buildings in Lower Alloways Creek Township with a total assessed value of improvements of \$170,766,100. Figure 6-3 shows the footprints of these buildings.

**Figure 6-3: Lower Alloways Creek Township Building Footprints<sup>10</sup>**

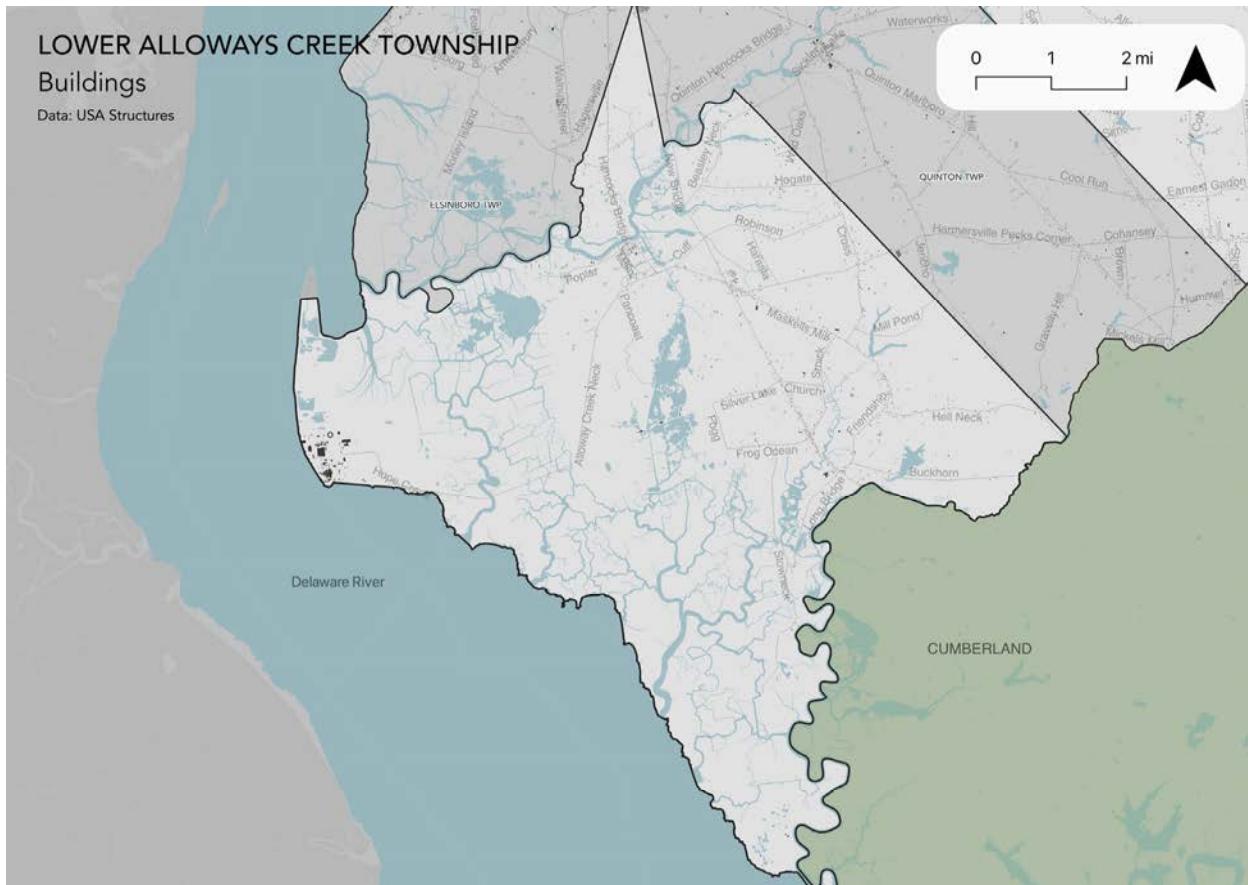


Table 6-3 shows the distribution of these structures according to land use distinctions.

**Table 6-3: Lower Alloways Creek Township Buildings per Land Use Type<sup>11</sup>**

Land Use Type	Residential (<4 units)	Multi-Family	Farm	Commercial	Industrial	Other <sup>12</sup>
Number of Buildings	834	0	404	6	50	104
% of Total	59.7%	0.0%	28.9%	0.4%	3.6%	7.4%

<sup>10</sup> Building footprint data was isolated from FEMA's "USA Structures" data (2022) per [https://disasters.geoplatform.gov/publicdata/Partners/ORNL/USA\\_Structures/New%20Jersey/](https://disasters.geoplatform.gov/publicdata/Partners/ORNL/USA_Structures/New%20Jersey/).

<sup>11</sup> Land use types were isolated from MOD-IV Parcels and Tax Assessor data composite (2021) per <https://www.state.nj.us/treasury/taxation/pdf/lpt/modIV/manual.pdf>.

<sup>12</sup> Other includes: Schools, Public Use, and other Exempt uses

## Part 3: Hazard Identification and Risk Assessment

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### Part 3.3: Critical Facilities

As of September 2023, there are eight (8) critical facilities in Lower Alloways Creek 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 includes 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: Lower Alloways Creek Township Critical Facilities Inventory**

CF #	Name	Type <sup>13</sup>	Sub-Type	Address	Co-located CF #	Shelter (Y/N)	Generator (Y/N)	Comments	Mitigation Measure #
CF-1	Municipal Building	Municipal	Administrative Offices	501 Locust Island Road, Hancocks Bridge	CF-2, CF-3	N	Y		
CF-2	Emergency Operations Center	EOC	Co-located Facilities	501 Locust Island Road, Hancocks Bridge	CF-1, CF-3	N	Y		
CF-3	Police Station	Law Enforcement Facilities	Stations	501 Locust Island Road, Hancocks Bridge	CF-1, CF-2	N	Y		
CF-4	Lower Alloways Creek Fire & Rescue – Hancocks Bridge Station	FireStation	Stations	15 New Street, Hancocks Bridge		N	N		M-2
CF-5	Lower Alloways Creek EMS & Rescue	EMS	Municipal Stations	8 Pecks Corner Road, Salem	CF-6	N	N	Volunteers staff Township EMS station. <sup>14</sup>	M-3

<sup>13</sup> Critical facility type and subtype definitions and considerations are described in *Section 3: Hazard Identification and Risk Assessment* of the SC HMPU Base Plan.

<sup>14</sup> As of September 2023, contract arrangements for ambulance services are being made with Elmer Borough (along with multiple municipalities in Salem County).

### Part 3: Hazard Identification and Risk Assessment

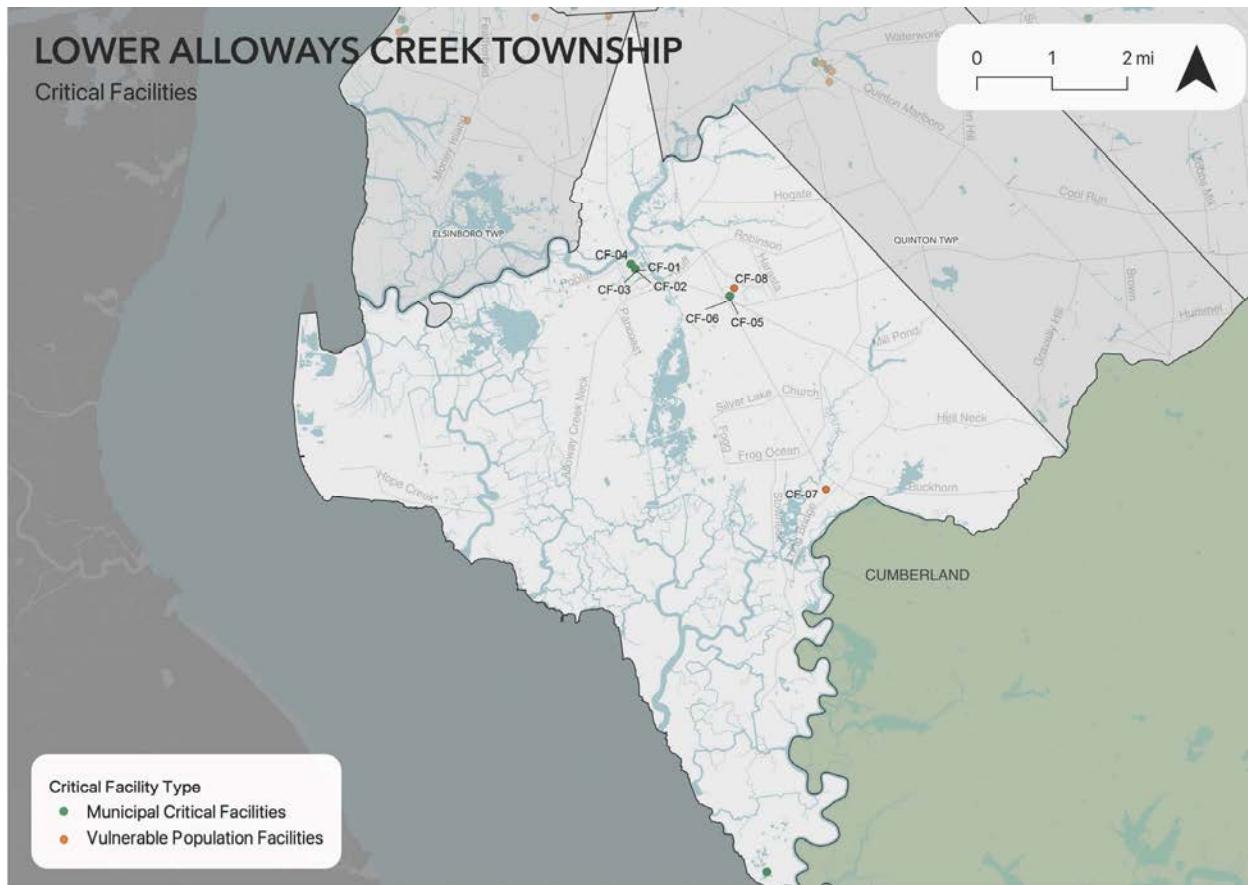
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CF #	Name	Type <sup>13</sup>	Sub-Type	Address	Co-located CF #	Shelter (Y/N)	Generator (Y/N)	Comments	Mitigation Measure #
CF-6	Public Works	Public Works	Combined Administrative Office, Maintenance / Work Area, Equipment / Material Storage, and Fueling Station	8 Pecks Corner Road, Salem	CF-5	N	Y		
CF-7	Lower Alloways Creek Elementary School	Schools	Public Schools	967 Main Street, Salem		Y <sup>15</sup>	Y		M-5
CF-8	Leisure Arms Senior Housing Complex	Vulnerable Populations Facilities	Public Age-Restricted Housing	622 New Bridge Road, Hancocks Bridge		Y	N	Residents must be at least 65 years of age. Complex includes 27 units and Community Center that serves as congregate shelter.	

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<sup>15</sup> As of September 2023, Lower Alloways Creek Township Board of Education intends to request review by the American Red Cross of shelter conditions at Lower Alloways Creek Elementary School.

**Figure 6-4: Lower Alloways Creek Township Critical Facilities**



### Part 3.4: Hazard Exposure Assessment

Hazard exposure assessments were completed for the eleven (11) natural hazards identified in the SC HMPU Base Plan<sup>16</sup>.

Key results for Lower Alloways Creek Township are depicted in the following.

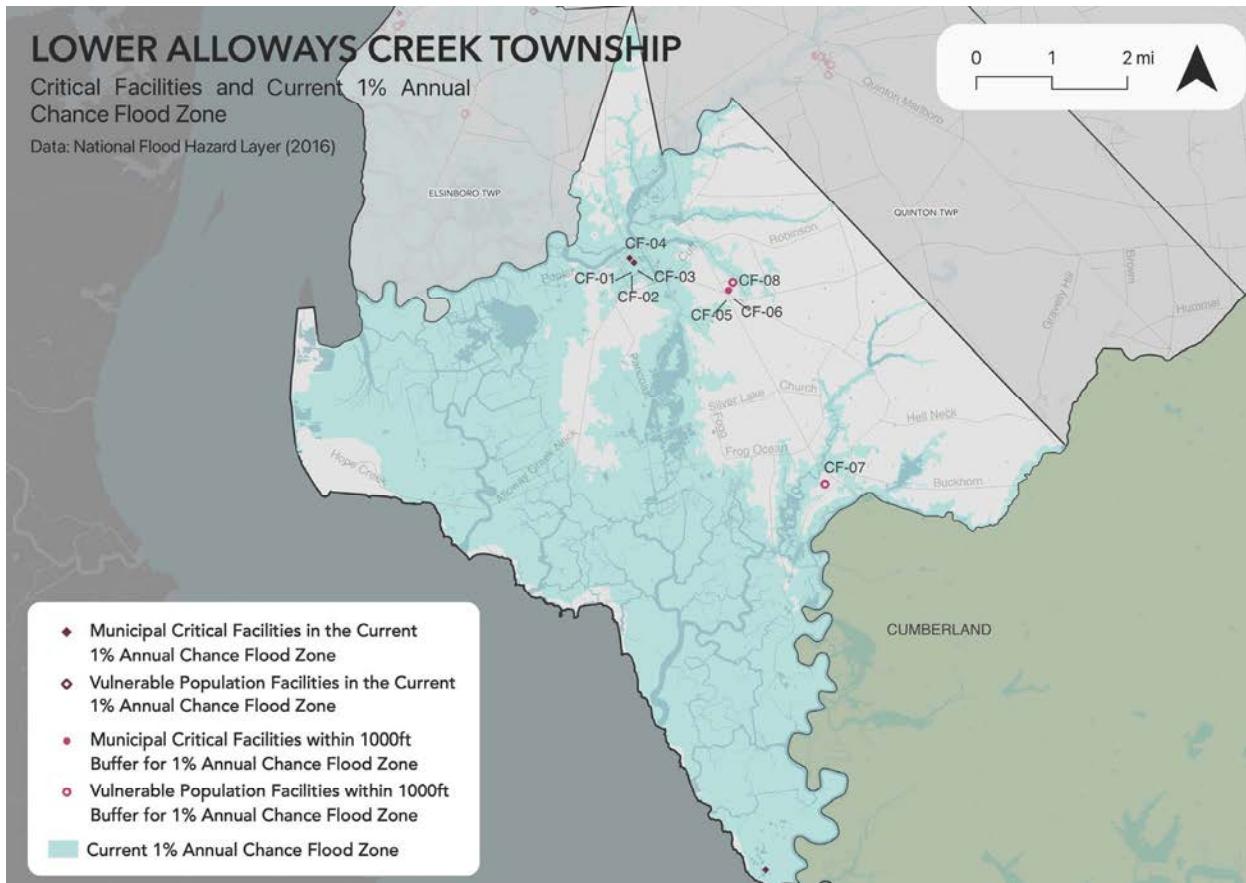
Mapping: Figure 6-5 is illustrative of the type of mapping available as a result of the hazard exposure assessment. This figure shows critical facilities that are located in or near (i.e., within 1,000 feet) the 1% annual chance flood zone on FEMA's Flood Insurance Rate Maps (FIRMs).

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<sup>16</sup> Hazard profiles are included for all eleven natural hazards in *Section 3: Hazard Identification and Risk Assessment* of the SC HMPU Base Plan.

## Part 3: Hazard Identification and Risk Assessment

Figure 6-5: Lower Alloways Creek 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>17</sup>

- Sea Level Rise
- Earthquake
- Extreme High Temperature
- Flood - per FEMA flood hazard mapping
- High Wind and Severe Weather (heavy summer rains and winter snow loads)

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, differentiated between municipal and vulnerable population critical facilities

In addition, available information regarding Wildfire is included.

<sup>17</sup> All mapping corresponding to results described in Parts 3.3 through 3.5 are viewable in .pdf format at: <https://www.dropbox.com/sh/1om9p8vogs03jxz/AABuCWd9odbr2KsbcD9YrFyCa?dl=0>.

### Part 3: Hazard Identification and Risk Assessment

**Table 6-5: Lower Alloways Creek 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
Sea Level Rise - 3 feet increase <sup>18</sup>	235	16.82%	\$14,992,498	8.78%
Flood - Within 1 % Annual Chance Zone	216	15.5%	\$11,751,807	6.9%
Flood - Near (within 1,000 feet) of 1% Annual Chance Zone	761	54.5%	\$90,490,616	53.0%
Earthquake – Structure built before 1927 <sup>19</sup>	278	33.7%	\$12,336,000	7.2%
High Winds / Severe Weather – Structure built before 1976	554	67.2%	\$27,157,400	55.3%

**Table 6-6: Lower Alloways Creek Township Critical Facilities Hazard Exposure<sup>20</sup>**

Hazard	Number of Critical Facilities	Municipal CF #s	Vulnerable Populations CF #s
Sea Level Rise	4	CF-01, CF-02, CF-03, CF-04	
Flood - Within 1 % Annual Chance Zone	4	CF-01, CF-02, CF-03, CF-04	
Flood – Future potential (within 1,000 feet) 1% Annual Chance Zone	4	CF-05, CF-06	CF-07, CF-08

Regarding Wildfire, according to the 2017 NJ4 HMP, Lower Alloways Creek Township is one of 7 municipalities in Salem County with more than one acre of land that intersects with an extreme level of potential fuel and potentially high levels of wildland urban interface. Lower Alloways Creek Township was the seventh highest in Salem County with 2.94 acres.

In addition, all critical facilities in Salem 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>18</sup> All supporting data for Sea Level Rise (3-foot rise), and Flood (all) are viewable at [SALEM\\_Buildings\\_Values\\_SLR\\_Flood](#)

<sup>19</sup> All supporting data for Earthquake, High Winds, and Severe Weather are viewable at [SALEM\\_Buildings\\_Values\\_EQ\\_Wind\\_SWW](#)

<sup>20</sup> All supporting data for critical facility hazard exposure are viewable at [SALEM\\_CFs\\_HazardExposure](#)

## Part 3: Hazard Identification and Risk Assessment

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Information from the 2017 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>21</sup>:

- There are no (0) "High Hazard" dams located in the Township.
- There is one (1) "Significant Hazard" dam located in the Township
  - Maskells Mill Pond Dam on the Upper Branch of Stowe Creek
- No (0) dam failure incidents had been recorded in the Township as of 2014

### Levee Failure

Per the South Jersey Levee Inventory<sup>22</sup>:

- There are thirteen (13) levees in the Township with a total of two hundred and twenty (220) parcels within a 1,000-foot buffer of the levees:
  - Locust Island (NCRS #13), length = 8,934 feet
  - Silver Lake (NCRS #14), length = 9,617 feet
  - Lower Alloways Creek (NCRS #30), length = 4,282 feet
  - Private Landowner (unknown) (NCRS #31), length = 5,421 feet
  - Beasley Neck Road (2) (NCRS #34), length = 2,046 feet
  - Moores Bank (NCRS #37), length = 1,680 feet
  - Private Landowner (unknown) (NCRS #38), length = 1,639 feet
  - Grosscup (NCRS #39), length = 340 feet
  - Hancocks Bridge Poplar (NCRS #40), length = 4,785 feet
  - County Highway 623 (NCRS #41), length = 4,151 feet
  - Long Bridge Outlier (NCRS #43), length = 2,610 feet
  - Long Bridge Road (NCRS #44), length = 2,240 feet
  - Buckhorn Bridge (NCRS #46), length = 1,146 feet
- There are multiple reported incidents of levee failure on the Silver Lake (NCRS #14) levee in 1933, 1950, 1955, and 1956
- There is one (1) reported incident of levee failure on the Locust Island (NCRS #13) levee in 1940

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 Lower Alloways Creek Township Working Group, there were:

- The following clarification to the NJ4 HMP HIRA Dam Failure hazard exposure results
  - The Maskells Mill Pond Dam on the Upper Branch of Stowe Creek is owned and maintained by the State of New Jersey.
- The following changes to the NJ4 HMP HIRA Levee Failure hazard exposure results:
  - Buckhorn Bridge (NCRS #46) is no longer operational but there are no built assets in harm's way.
  - Township made repairs to the bank on the levee indicated as "Private Landowner (unknown) (NCRS #31)"

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<sup>21</sup> (1) NJDEP Dam Safety and Flood Control (Dam Locations); (2) NJDEP Land Use / Land Cover; (3) US Census Bureau 2010 Census

<sup>22</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>23</sup>. The following depicts relevant numbers for Lower Alloways Creek Township as of September 2023 as provided by the Region II office of the Federal Emergency Management Agency (FEMA):

#### **Active Policies**

- Active Policies – 21 active NFIP flood insurance policies, which represents 1.37% of all active policies in Salem County
- Total Premiums – \$28,622 paid in total annual premiums
- Average Premium – \$1,363 average annual premium per policy, as compared to the overall average for all Salem County of \$985

#### **Repetitive Loss Properties**

- No (0) properties are designated as either Repetitive Loss or Severe Repetitive Loss Properties (SRL)

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 significantly higher than the number of active policies:

- Flood - Within 1 % Annual Chance Zone: 216 buildings ~ 15.5% of total buildings, with a value of \$11,751,807 ~ 6.9% of the total building value in the Township.
- Flood - Near (within 1,000 feet) of 1% Annual Chance Zone: 761 buildings ~ 54.5% of total buildings, with a value of \$90,490,616 ~ 53.0% of the total building value in the Township.

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<sup>23</sup> Information on the NFIP is described in *Section 3: Hazard Identification and Risk Assessment* of the SC HMPU Base Plan.

## Part 3: Hazard Identification and Risk Assessment

### Part 3.5: Demographic Considerations

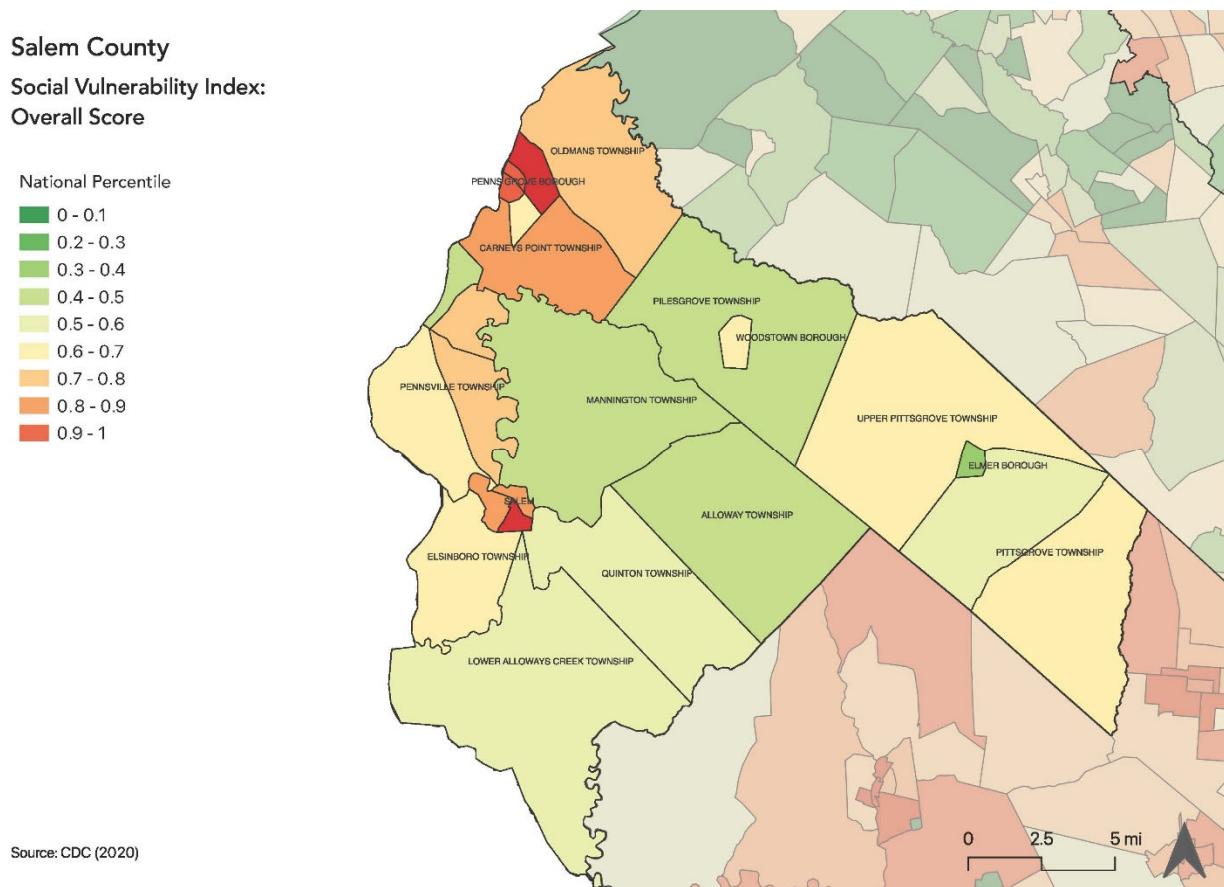
Demographic considerations include general population and land use factors. Table 6-7 includes current population estimates and changes since the previous US Census<sup>24</sup>:

**Table 6-7: Lower Alloways Creek Township General Population Demographics**

Metric	Current Estimates
2020 Population	1717
Percent Population Change (2010-2020)	- 3.49%
Land Area	45.23 sq. miles
Population Density	38.0 / sq. mile

Demographic considerations also include differences in social vulnerability<sup>25</sup>. Figure 6-6 shows the overall Social Vulnerability (SVI) Index overall scores for Salem County.

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



<sup>24</sup> 2020 US Census

<sup>25</sup> Social vulnerability considerations are described in *Section 3: Hazard Identification and Risk Assessment* of the SC HMPU Base Plan.

## Part 3: Hazard Identification and Risk Assessment

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

**Table 6-8: Lower Alloways Creek Township Social Vulnerability Considerations<sup>26</sup>**

Metric	Comparison with all National Census Tracts
Socioeconomic Status	41 <sup>st</sup> percentile
Household Characteristics	52 <sup>nd</sup> percentile
Racial and Ethnic Minority Status	21 <sup>st</sup> percentile
Housing Type and Transportation	71 <sup>st</sup> percentile

In addition, the percentage of residents earning below poverty level = 5.2% (compared with the average in Salem County of 12.6 % and 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 flood, sea level rise, dam failure, levee failure, and/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).
- Several critical facilities are potentially vulnerable to flood, sea level rise, dam failure, levee failure, and/or wildfire] hazards 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>26</sup> All supporting data for SVI is viewable at [SVI Data](#) .

## 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 SC 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

- Flood
- Levee Failure

#### Moderate Priority

- High Wind

#### Low Priority

- Dam Failure
- Drought
- Earthquake
- Extreme Temperature: Cold & Hot
- Sea Level Rise
- Severe Weather – Summer
- Severe Weather – Winter
- Wildfire

*Note: These hazard priorities differ from the NJ4 HMP results per the following:*

- ✓ *Flood moved from Moderate to High*
- ✓ *High Wind moved from Low to Moderate*

## Part 3: Hazard Identification and Risk Assessment

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### Part 3.8: Climate Change Considerations

The following is based on results and assumptions from Sections 3.2 and 3.6 of the Base Plan regarding potential consequences of climate change. Table 6-9 is an excerpt from Table BP.3-44 that shows the potential impacts of climate change on a hazard-by-hazard basis for Lower Alloways Creek Township.

**Table 6-9: Potential Climate Change Impacts**

Municipality	Dam Failure	Drought	Earthquake	Extreme Temperature	Flood	High Wind	Levee Failure	Sea Level Rise	Wildfire	Composite Score
Lower Alloways Creek Township	M	L	L	M	M	M	H	H	L	H

Based on these results and assumptions, when compared to the other 13 participating municipalities, the overall potential for climate change impacts on Lower Alloways Creek Township is high.

The hazards where climate change may create the most impact for Lower Alloways Creek Township are:

- Dam Failure
- Extreme Temperature
- Flood
- High Wind
- Levee Failure
- Sea Level Rise

See the discussion in Section 3.2 and summary points in Section 3.6 of the Base Plan regarding how these potential impacts can be reflected in the implementation of the SC HMPU and mitigation measures in the community's Appendix.

## 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 SC 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
- 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

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### 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 SC HMPU, the related NJ4 HMP mitigation measures were candidates for inclusion in the Municipal Appendix.

Table 6-10 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 6-10.

**Table 6-10: Status of Lower Alloways Creek Township NJ4 HMP Mitigation Measures**

Mitigation Action, Program, or Project	Status	Comments	Mitigation Measure # 2728
<b>M-1:</b> Identify and pursue outreach and education opportunities to inform municipal residents, businesses, and property owners.		Work-in-progress included: <ul style="list-style-type: none"><li>▪ Use of municipal website for emergency or hazard information dissemination</li><li>▪ Follow-up with critical facilities regarding projects</li><li>▪ Formal Working Group Meetings on Third Tuesday of every month</li><li>▪ Informal discussions among municipal officials, etc.</li></ul>	
<b>M-2:</b> Prioritize critical facilities and complete site and facility surveys to identify vulnerabilities and potential mitigation measures.	Work-in-progress		Carried over as part of M-1
<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> Install permanent backup emergency power generator at Fire Department on 773 Smick Road.	No longer considered relevant as facility is no longer in use.		N/A
<b>M-6:</b> Install permanent backup emergency power generator at Lower Alloways Creek Fire & Rescue Fire Department (CF-4).	No progress, lack of funding		Carried over as M-2
<b>M-7:</b> Install permanent backup emergency power generator hookup at EMS facility (CF-5).	No progress, lack of funding		Carried over as M-3
<b>M-8:</b> Conduct risk assessment to identify and map erosion hazard zones to include Lower Alloways Creek Neck Road.	No progress, lack of funding		Carried over as M-4

<sup>27</sup> Detailed information for identification and implementation of municipal (designated with “M”) mitigation measures are included in Tables 6-11 and 6-12.

<sup>28</sup> Detailed information for identification and implementation of multi-jurisdictional (designated with “MJ”) mitigation measures are included in Table 6-13.

## Part 4: Mitigation Measures

Mitigation Action, Program, or Project	Status	Comments	Mitigation Measure # 2728
<b>M-9:</b> Retrofit / harden Lower Alloways Creek Elementary School, to include the roof (CF-7).	Work-in-progress	Roof completely replaced in phases, completed in 2015 by Board of Education using general funds. Doors are relatively new Windows still potentially need replacement.	Carried over as M-5
<b>M-10:</b> Conduct risk assessment of levee associated failures in Lower Alloways Creek Township.	Work-in-progress	USACE assessments were conducted via imaging and field surveys.	Carried over as M-6
<b>M-11:</b> Conduct risk assessment of levee at Locust Island to better understand the potential flood hazard and required levee upgrades.	Work-in-progress		Carried over as M-7
<b>M-12:</b> Conduct risk assessment of levee at Silver Lake to better understand the potential flood hazard and required levee upgrades.	Work-in-progress		Carried over as M-8
<b>MJ-1:</b> Alleviate flooding at County Route 658 (Salem Hancock Bridge Road) and County Route 606 (Front Street).	No progress		Carried over as MJ-1
<b>MJ-2:</b> Alleviate flooding at County Route 623 <sup>29</sup> (New Bridge) and County Route 651 (Beasley Neck Road).	No progress		Carried over as MJ-2

In addition, since the 2017 NJ4 HMP, the Township completed the following project related to hazard mitigation:

- Repairs were made to a levee identified in the SJLI as “Private Landowner (NCRS #31)” by Lower Alloways Creek Township on March 18, 2022. The properties protected were Block 20 Lots 1 and 2. The cost for repairs was incurred by the Township.

<sup>29</sup> County Route 623 is the main evacuation route for Lower Alloways Creek Township.

## Part 4: Mitigation Measures

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### Part 4.3: Municipal Mitigation Measures – Identification

Table 6-11 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>30</sup> if applicable

Table 6-11 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 6-11: Lower Alloways Creek Township Municipal Mitigation Measures Identification**

#	Mitigation Action, Program, or Project	Hazard(s)	Goal (s)	Existing or New Structures
M-1	<u>Municipal Mitigation Program</u> – including sustained efforts in cooperation with Salem County Office of Emergency Management (SC OEM) to: <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 Municipal Working Group</li><li>▪ Seek integration of hazard mitigation with other parallel planning initiatives</li></ul>	All	All	Both
M-2	Install permanent backup emergency power generator at Lower Alloways Creek Fire & Rescue Fire Department (CF-4).	Power outage due to multiple hazard types.	Goal #4	Existing
M-3	Install permanent backup emergency power generator hookup at EMS facility (CF-5).	Power outage due to multiple hazard types.	Goal #4	Existing

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<sup>30</sup> Section 3: Hazard Identification and Risk Assessment of the SC HMPU Base Plan includes a description of RL and SRL properties.

## Part 4: Mitigation Measures

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#	Mitigation Action, Program, or Project	Hazard(s)	Goal (s)	Existing or New Structures
M-4	Conduct risk assessment to identify and map erosion hazard zones to include Lower Alloways Creek Neck Road.	Sea Level Rise	Goals #2 and #4	Existing
M-5	Retrofit / harden Lower Alloways Creek Elementary School, to include window replacements (CF-7).	High Wind	Goal #4	Existing
M-6	Conduct risk assessment of levee associated failures in Lower Alloways Creek Township.	Levee Failure	Goals #2 and #4	Existing
M-7	Conduct risk assessment of levee at Locust Island to better understand the potential flood hazard and required levee upgrades.	Levee Failure	Goals #2 and #4	Existing
M-8	Conduct risk assessment of levee at Silver Lake to better understand the potential flood hazard and required levee upgrades.	Levee Failure	Goals #2 and #4	Existing

### Part 4.4: Municipal Mitigation Measures – Implementation

Table 6-12 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>31</sup>
- Project Type to help determine funding options and implementation mechanisms at the municipal level<sup>32</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

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<sup>31</sup> Section 4: Mitigation Measures of the SC HMPU Base Plan includes a description of evaluation criteria considered by the Municipal Working Group.

<sup>32</sup> Section 4: Mitigation Measures of the SC HMPU Base Plan includes a description of project types and related information regarding funding options and implementation mechanisms.

## Part 4: Mitigation Measures

**Table 6-12: Lower Alloways Creek 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	Municipal Mitigation Program	Office of Emergency Management	High	Program	Staff Time	On-going, sustained effort	<ul style="list-style-type: none"> <li>▪ Identify outreach and education objectives and methods (working with SC OEM)</li> <li>▪ Set priorities (if necessary) and initiate critical facility field assessments</li> <li>▪ Identify schedule for plan updates (including sustained public participation and plan integration efforts)</li> </ul>
M-2	Install permanent backup emergency power generator at Lower Alloways Creek Fire & Rescue Fire Department (CF-4).	Municipal OEM and Fire Department	Low	Back-up Emergency Power Generator	< \$100K	Three to five years	Conduct project scoping. <sup>33</sup>
M-3	Install permanent backup emergency power generator hookup at EMS facility (CF-5).	Municipal OEM and EMS	Low	Back-up Emergency Power Generator	< \$100K	Three to five years	Conduct project scoping.
M-4	Conduct risk assessment to identify and map erosion hazard zones to include Lower Alloways Creek Neck Road.	Municipal OEM	Low	Private Property Mitigation	< \$50K	Three to five years	Develop scope of work for engineering study and procure professional consulting services.
M-5	Retrofit / harden Lower Alloways Creek Elementary School, to include window replacements (CF-7).	Municipal OEM and School Board	Low	Building Retrofit	\$100K - \$500K	Three to five years	Conduct project scoping.
M-6	Conduct risk assessment of levee associated failures in Lower Alloways Creek Township.	Municipal OEM and Public Works Department	Moderate	Private Property Mitigation	< \$50K	Three to five years	Develop scope of work for engineering study and procure professional consulting services.
M-7	Conduct risk assessment of levee at Locust Island to better understand the potential flood hazard and required levee upgrades.	Municipal OEM and Public Works Department	Low	Private Property Mitigation	< \$50K	Three to five years	Develop scope of work for engineering study and procure professional consulting services.

<sup>33</sup> Project scoping for M-2 and M-3 to include determining feasibility to install hookup and transfer switch for using portable generator(s) to accommodate need, at least as a temporary measure

## Part 4: Mitigation Measures

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#	Mitigation Action, Program, or Project	Responsible Part(ies)	Priority	Project Type	Estimated Cost (\$)	Target Date	Next Step(s)
M-8	Conduct risk assessment of levee at Silver Lake to better understand the potential flood hazard and required levee upgrades.	Municipal OEM and Public Works Department	Low	Private Property Mitigation	< \$50K	Three to five years	Develop scope of work for engineering study and procure professional consulting services.

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 :
  - Buildings potentially exposed to 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 were reviewed as part of the Round 2 Working Group Meeting and 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, Sea Level Rise, Dam Failure, Levee Failure, 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

## 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 were compiled in Table 6-13.

These measures have been referred to the County Working Group for consideration. As part of the implementation of the SC 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

**Table 6-13: Lower Alloways Creek Township Multi-Jurisdictional Mitigation Measures**

#	Problem Description	Hazard(s) Addressed	Goal Addressed	Applies to Existing or New Structures	Potential Partners	Priority
MJ-1	Alleviate flooding at County Route 658 (Salem Hancock Bridge Road) and County Route 606 (Front Street).	Flood (Storm Surge & Tidal)	Goal #4	Both	Municipal OEM, Salem County DPW	High
MJ-2	Alleviate flooding at County Route 623 <sup>34</sup> (New Bridge) and County Route 651 (Beasley Neck Road).	Flood (Storm Surge & Tidal)	Goal #4	Both	Municipal OEM, Salem County DPW	High
MJ-3	Replace bridge on County Route 623 that has been out of service for lengthy period. <sup>35</sup>	Flood (Storm Surge & Tidal)	Goal #4	Both	Municipal OEM, Salem County, DPW]	High

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<sup>34</sup> County Route 623 is the main evacuation route for Lower Alloways Creek Township.

<sup>35</sup> MJ-3 is a new mitigation measure identified by the SC HMPU Working Group.

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

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

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

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

- Involvement of Floodplain Administrator during the SC 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 SC 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 SC 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 SC HMPU Base Plan also includes summary statements regarding county and municipal resources and the impact of resource limitations on the overall approach to the SC HMPU mitigation strategies.

Table 6-14 compares the results of the Capability Assessment Survey for the County as a whole and Lower Alloways Creek Township.

## Part 4: Mitigation Measures

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**Table 6-14: Lower Alloways Creek Township Capability Assessment Survey Results**

Metric	Lower Alloways Creek Township Results (n=3)	Salem County "as a whole" Results (n=52)
Position Type: <b>Full-time</b>	0%	29%
Position Type: <b>Part-time</b>	100%	71%
Position Type: <b>Volunteer</b>	0%	0%
Time in Position: <b>Less than 1 year</b>	66%	23%
Time in Position: <b>1 to 2 years</b>	0%	12%
Time in Position: <b>2 to 5 years</b>	0%	19%
Time in Position: <b>More than 5 years</b>	33%	46%
Prior Experience: <b>None</b>	66%	50%
Prior Experience: <b>with hazard mitigation planning</b>	0%	37%
Prior Experience: <b>with HMA grant administration</b>	0%	12%
Prior Experience: <b>with floodplain management</b>	33%	12%
Training / Certifications: <b>None</b>	66%	71%
Training / Certifications: <b>for hazard mitigation planning and implementation</b>	0%	19%
Training / Certifications: <b>for floodplain management</b>	33%	10%

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

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

### 4.6.3: Plan Review and Integration

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

- Table BP.4-2 that identifies primary plans and documents collected from each of the participating municipalities.
- Results of reviewing primary plans and documents to determine the extent to which these documents reflect up-to-date hazard risk and mitigation.
- Recommendations for integrating the results of the SC 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 Lower Alloways Creek Township Working Group include:

Specific documents obtained during the NJ4 HMP plan update process from the Municipal Working Group include:

- Emergency Operations Plan – Base Plan (2023)
- Capital Improvement Budget (2023)
- Land Development Ordinance (2021)
- Master Plan (1992) and Reexamination Report (2012)
- Stormwater Control for Major Developments (2021)

In addition, the following is the status of the Flood Damage Prevention Ordinance (FDPO):

- Current version was adopted in April 2016 and is consistent with the most recent FDPO per NJDEP available at that time.
- The Construction Code Official is the responsible party for enforcement. 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>36</sup>

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<sup>36</sup> <https://ecode360.com/13785037>

## **Part 4: Mitigation Measures**

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