

Review of the Draft Flood Mitigation Plan - Somerset County, Maryland

Comments from the Deal Island Peninsula Partnership (DIPP)

Submitted on behalf of DIPP by the DIPP Coordination Committee:

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- *(Recusals: Mary Phipps Dickerson, MDE; Gary Pusey, Somerset County)*

The Plan's Development Process:

- The description of the planning process creates the impression that the Deal Island Peninsula Partnership (DIPP) played a role in shaping this plan as members of the Stakeholder Group. We would like this to be revised because it does not reflect our experience with the plan development process thus far. While two of our members did participate in the one of the meetings (the third and final stakeholder meeting), neither of us felt informed enough about the plan or the planning process to meaningfully contribute to the discussion. As a result, we do not believe that DIPP should be listed as part of the group of individuals, agencies, and organizations that steered the plan's development. That said, DIPP would be interested in playing a greater role in the development of this plan such as providing additional information or guidance on the integration of the suggestions below.
- We encourage future flood mitigation plans carried out by the County to use a more inclusive process for community leaders or representatives to participate as stakeholders. This could be accomplished by:
 - Providing more information about the planning process on the website (e.g. detailed overview of flood mitigation plans – what are they? What is the benefit of developing one? And what are Somerset County's objectives for this particular plan?)
 - Provide more opportunity for public participation. For example:
 - Host additional stakeholder meetings after normal business hours to elicit local input (many people with day jobs are likely not able to participate in virtual meetings hosted during the middle of the workday).

- Provide mechanisms for people to submit comments directly through your website. Currently, interested stakeholders are only given the option to sign up for an email list.
- Consider ways to get information out to communities beyond social media, which is not used by everyone, particularly older demographics.

Minor Edits:

- In the description (PG 2-1), “Little Deal Islands” should be changed to Deal Island; Little Deal Island is an uninhabited extension of the community of Wenona on the Deal Island Peninsula.
- The map on 2-2 is missing a legend.
- On the maps of flood vulnerability on the Deal Island Peninsula, the community of Chance is oftentimes labeled as “Champ” (see pg. 2-6, 2-18). Please correct.
- Throughout the report, there is reference to “the critical bay area”; this should be changed to the Chesapeake Bay Critical Area, or “Critical Area” for short.

Significant Concerns:

- Vulnerability measures included in the draft plan fail to consider the impacts of social vulnerability. Vulnerability is almost exclusively measured in terms of cost of storm/flood damage to physical structures; However, we argue that vulnerability measurements should also consider *who* is most sensitive to storm/flood impacts (due to their socio-economic health, race, age, etc.), i.e. who has the least amount of capacity to respond, recover, and adapt to these events. We recommend that social vulnerability be considered a criterion of your prioritization process (using tools such as the [CDC’s Social Vulnerability Index](#)) to ensure that Somerset County is able to support appropriate mitigation actions that more effectively meet all residents’ and stakeholders’ needs.
- Use of FEMA’s Repetitive Loss Properties categorization as a measure of household-level vulnerability does not capture the large number of uninsured homes that are also vulnerable to flood impacts. As an example, we know that there are a number of households on the Deal Island Peninsula that do not have flood insurance because they do not carry a mortgage, and therefore are not required to pay for flood insurance coverage. We also know that the decision to not carry flood insurance is often a choice driven by affordability considerations. Those individuals who do not have flood insurance -- particularly those who choose not to carry it because they cannot afford to -- are arguably more vulnerable to flooding because they have the least financial capacity to rebound from and adapt to flood impacts. Uninsured households, if overlaid with some

of your existing flood vulnerability maps (of physical risk), could be used as a proxy for capturing socially vulnerable households within the County.

- While we appreciate that the draft Plan acknowledges the Deal Island Peninsula Partnership (DIPP), it fails to effectively integrate DIPP's assessments of local flooding vulnerability on the Deal Island Peninsula. We have done extensive and careful work to document local concerns of flooding through an [Integrated Coastal Resiliency Assessment](#) (ICRA), a collaborative initiative carried out from 2016-2018 with local residents to 1) identify areas of concern on the Peninsula, 2) assess vulnerabilities of those areas, and 3) develop a prioritization process to identify key issues and develop projects to address those issues. The four areas of concern that ICRA participants identified was: 1) the Deal Island & Wenona Harbors (the commercial centers of the Peninsula), 2) Dames Quarter, 3) the Deal Island Shoreline and Ballard Road and Crowell Road communities, and 4) the Oriole and Champ communities.

Two key issues of concern were identified through the ICRA process: 1) ditch-caused flooding and 2) shoreline erosion, both which are relevant to this Flood Mitigation Plan. Many residents who participated in the ICRA stressed the importance of improving ditch drainage. Higher tides and storm events often cause ditches to overflow onto roadways, which in turn impact residents' ability to access their homes, as well as critical services (e.g. school buses, emergency services). It also has a financial impact due to property damage (e.g. saltwater damage to vehicles, damage to yards, damage to structures on property). Shoreline erosion is of particular concern for a stretch of shoreline on Deal Island, which protects interior sections of Deal Island, including the low-lying, historically Black community on Ballard Road that is located just behind this shoreline and an adjacent marsh complex. The shoreline has become severely eroded to the point that occasionally it is breached during storms or extreme tidal events. Should this shoreline become permanently breached, it has the potential to impact Deal Island Road (MD-363) and cut off access to Wenona. Somerset County and the Maryland Department of Natural Resources are implementing a living shoreline project this year to protect this shoreline, but it remains a concern for locals. Both shoreline erosion and ditch maintenance should be included in the overview of the Deal Island Peninsula's issues of concern.

We would like to note that it was the DIPP ICRA process that led the County to invest in the *Deal Island Open Ditch Drainage System Assessment* (highlighted in the Flood Mitigation Plan (p. 4-48)). We request that the draft plan acknowledge this linkage.

- The draft plan outlines 10 proposed projects, which largely limit local participation to education and outreach efforts; however, we would encourage the County to consider

other ways to work more *collaboratively* with communities in developing and implementing flood mitigation efforts. Over the last eight years, DIPP has invested in developing collaborative processes to engage a range of stakeholders (local, government, NGO, academia) in discussions related to improving coastal resilience on the Deal Island Peninsula. We have repeatedly found that facilitating more inclusive spaces for a range of voices to be a part of decision-making leads to more productive and effective planning processes. We have responded directly to each of the proposed priority projects below, and offer some suggestions on how to increase community collaboration throughout.

Response to Proposed Priority Projects:

1) Business Continuity Workshop:

“Identify and solicit low/no cost partners to create awareness and promote outreach. For example, conduct a business continuity planning workshop to promote disaster resiliency, mitigation, and preparedness to help businesses develop contingency plans to minimize loss during disasters.”

It would be worth hosting multiple workshops in order to tailor this training to different types of businesses and settings around the County (e.g., urban vs. rural, small vs. large, sector types) in order to have a greater impact. Hosting this as one generic workshop/webinar may not be as effective due to the lack of specific guidance that could be provided to, for example, a farmer versus an urban shop owner. We would also encourage the County to consider expanding this training to include workshops for non-profit/civic organizations as well (e.g. churches, social clubs, heritage museums, etc.). While not technically businesses, these organizations often represent the social and cultural hubs of many of the rural communities that are highlighted in this plan. Excluding them would be a major oversight.

These workshops should also be used to provide training to business owners on how to apply for flood mitigation grants in order to help them leverage financial resources to reduce their flood risk.

2) Protecting People and Property: Floodplain Awareness Workshop

“Create awareness among county residents of the potential hazards associated with floodplain areas and the ways they can protect themselves and their properties from flood events. Provide targeted outreach to residents within high-risk areas identified herein.”

It is not clear from the language whether this proposal is to host one workshop or multiple workshops. Again, we recommend that this not be hosted as one workshop, but rather as a series of “on-the-road” and/or online workshops to take this information directly to communities. We suggest hosting these after regular business hours to enable more local residents to participate. We recommend advertising the event through local organizations (churches, Lions Clubs, etc.), especially when outreaching to areas where internet may be unreliable and/or with older populations that may not use social media. Similar to our recommendation for Project 1, these workshops should also be used to provide training to residents on how to apply for flood mitigation grants in order to help them leverage financial resources to reduce their flood risk.

We would also encourage the County to consider opportunities for two-way sharing at these workshops. For example, allow people to share their experiences and concerns with flooding (both cause and impact). In our experience, this can be a mechanism to create more inclusive participation and can help reveal additional mitigation needs that may not have otherwise been considered. As written now, this project puts the onus on residents to mitigate their local flood impacts when oftentimes the cause of local flooding is entirely outside of their control (e.g. drainage issues in ditches owned and managed by the County or State) and their ability to effectively respond and adapt is hindered by external forces (e.g. regulations). If re-oriented, these workshops could provide an opportunity to build partnerships with communities to identify actions that residents AND the County can take to support local flood mitigation needs.

We have noted that the DIPP has been identified as a potential partner. While the DIPP coordination committee would be willing to consider this role, we may need some financial support to do this.

3) High Priority Flood-prone Land Acquisitions

“Create a prioritized list of properties for land acquisition for flood mitigation and conservation. Emphasis should be placed on potential community projects rather than scattered sites. Consider “blighted” vacant flood prone properties.”

This proposed project runs a real risk of perpetuating climate injustices through land grabs. This should be of particular concern in targeted areas that are historically Black communities (which often are located on flood-prone marginal lands due to a long history of discriminatory practices). An important question that needs to be considered is how the County should compensate the families who own these properties and who have been forced to abandon them because of deteriorating environmental conditions.

We are particularly concerned with the fact that this project is marked as having a low initial cost. According to the plan’s cost and time measurements, the initial cost of this project is

considered to be \$0-\$100,000 (p. 4-15), yet the included table and maps highlight 73 acquisition properties valued between \$50,000-\$100,000 (and over \$100,000 in several cases). This suggests that these property owners will receive little to no compensation. Furthermore, it is not clear from this plan whether some of the \$0-\$100,000 cost estimate would need to be reserved for the proposed infrastructure removal, which would further reduce the amount of compensation funding. Much more careful consideration needs to be made about how the County plans to *fairly* compensate the property owners of these blighted sites. We recommend that the County develop a rubric for how targeted properties are identified with input across County partners and programs. We also recommend that the County utilize the housing stock assessment that was completed for Somerset County by the Eastern Shore Regional GIS Cooperative to identify socially vulnerable populations that may be impacted, and potential justice and equity concerns that could arise as a result.

The proposed project also provides no insights into how the County should navigate this process directly with communities, which the plan's authors acknowledge is likely to be contentious. This is a critical oversight. Opposition to land acquisition projects will likely be driven by issues of trust and concerns about injustice. We strongly encourage the County to approach land acquisition collaboratively with the communities, and in a way that is sensitive to local social and cultural histories, and attentive to justice and equity issues. It is important to develop this project in a way that is equitable and fair, and that does not promote climate resilience at the expense of communities that stand to lose the most.

4) Protecting Essential Facilities:

“Review and prioritize the 8 essential facilities that are located within all three flood hazard scenarios: 1-percent-annual-chance flood event, hurricane storm surge, and sea level rise.”

[No comments to provide]

5) Flood Insurance Training for Professionals

“Provide flood insurance and regulations training to area contractors, real estate agents, and insurance providers.”

[No comments to provide]

6) Website Management and Updates

“Add link to MDE’s Flood Risk application on the Somerset County’s Department of Planning and Zoning homepage.”

This tool should be incorporated into the workshops proposed as part of Projects 1 and 2. The County also needs to consider how to more proactively get this tool into the hands of local residents and business owners. Integrating it into the workshops noted above, or through other collaborative efforts with communities could be a way to make it more accessible and useful for County residents.

7) Repetitive Roadways Impacting Essential Facilities' Ingress/Egress

“Conduct engineering studies to determine the most effective mitigation measures to ensure the prevention of future flooding to roadways identified in the Somerset County Nuisance Flood Plan. Priority consideration should be given to those roadways that provide accessibility to critical facilities (refer to HMP Map 19-4 and 19-5).”

This project does not benefit the Deal Island Peninsula since Deal Island Road does not see repetitive flooding. However, we recommend that the County consider a second-tier list of essential facilities that could be impacted in the near future due to access limitations. As noted elsewhere in the plan, Deal Island Road provides the only access point to essential services on the Deal Island Peninsula. Roadway flooding on Deal Island Road does occasionally occur at St. Stephens. In the near future, this could become a significant issue for ingress/egress.

8) Flood Barriers and Other Protective Devices at Tidal Health Location

“Mitigate flood issues at Tidal Health and Alice Byrd Tawes Nursing Home by installing flood protection devices, including but not limited to, flood barrier”

[No comments to provide]

9) Promotion of MyCoast.org on Social Media

“Promote MyCoast.org app through social media and County’s website.”

We strongly recommend that the County consider expanding their outreach of MyCoast.org beyond social media and the County’s website. To effectively promote MyCoast, the County needs to think strategically about how to overcome the barrier of government mistrust, which is likely to be a barrier to local usage. Residents need to be able to understand *how* the County will use the data that they share through the app, and how these uses could *benefit them*. They also need to be able to see potential benefits realized. To do this, we encourage the plan’s authors to incorporate additional language that:

- 1) More explicitly explains how the County envisions using MyCoast data to inform flood mitigation. This is not at all clear in the draft as it is currently written.
- 2) Outlines an outreach and communication plan to support more sustained usage and community engagement. The County might want to consider developing a MyCoast newsletter with a summary of identified issues, links to relevant resources, updates on County flood mitigation efforts as they relate to hotspots identified through MyCoast data, etc. The County could also consider hosting public webinars or listening sessions to collaboratively explore data and discuss potential flood mitigation needs/actions with community users.

We would encourage the County to consider how MyCoast could be used to facilitate more collaborative engagements with communities; we see a real potential for using MyCoast to empower communities to tell their flooding stories and to help shape decisions about flood mitigation. On the Deal Island Peninsula, MyCoast could be a way to work collaboratively with local residents to track ditch maintenance issues, which DIPP has previously identified as a local issue of concern. Data collected through the app could be used to inform the County's ditch maintenance projects and/or help the County secure outside funding to address ditch maintenance needs, among other potential activities. Coordinated efforts to work *with* communities is needed for this to be an effective flood mitigation tool.

10) Stormwater Vulnerability Assessment and Green Infrastructure Identification

“Identify stormwater management issues and the most vulnerable properties affected in the County. Review area(s) to determine causes of issues, specifically lack of natural vegetation, if applicable. Adopt similar building regulations (such as those in the Critical Area) to these properties. This would include buffer zones with natural vegetation.”

Again, we encourage the County to consider how residents and community organizations in the targeted areas would be engaged in this process. This is likely to lead to some local opposition as green infrastructure expansion will require some property acquisitions and may raise other community concerns that have not been considered here.

Nature-based approaches to protect wetlands and other ecosystem services are critical, but need to be developed in collaboration with those who live and work around these sites to ensure that they do not undermine community-based needs.

For the geographic target areas on the Deal Island Peninsula (Deal Island and Deal Island Road (MD-363)), we also would encourage the County to consider other more flood-prone areas aside from Deal Island proper, which has the highest ground on the lower Peninsula.