

# LOCAL MITIGATION PLAN REVIEW TOOL

## Town of East Montpelier, VT - Final

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The *Local Mitigation Plan Review Tool* demonstrates how the Local Mitigation Plan meets the regulation in 44 CFR §201.6 and offers States and FEMA Mitigation Planners an opportunity to provide feedback to the community.

- The Regulation Checklist provides a summary of FEMA’s evaluation of whether the Plan has addressed all requirements.
- The Plan Assessment identifies the plan’s strengths as well as documents areas for future improvement.
- The Multi-jurisdiction Summary Sheet is an optional worksheet that can be used to document how each jurisdiction met the requirements of the each Element of the Plan (Planning Process; Hazard Identification and Risk Assessment; Mitigation Strategy; Plan Review, Evaluation, and Implementation; and Plan Adoption).

The FEMA Mitigation Planner must reference this *Local Mitigation Plan Review Guide* when completing the *Local Mitigation Plan Review Tool*.

<b>Jurisdiction:</b> Town of East Montpelier, VT	<b>Title of Plan:</b> Town of East Montpelier, VT Local Hazard Mitigation Plan	<b>Date of Plan:</b> (Created December, 2011 - Adopted October, 2012) Final Plan Adopted 10/1/12
<b>Single Plan or Multi-Jurisdiction:</b> SINGLE		<b>New Plan or Update:</b> NEW
<b>Regional Point of Contact:</b> Jennifer Mojo		<b>Local Point of Contact:</b>
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<b>State Reviewer:</b> Ray Doherty	<b>Title:</b> VEM State Hazard Mitigation Officer	<b>Date:</b>
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<b>FEMA Reviewer:</b> Regina Zwinklis Sandra Simonson Nan Johnson Barbara Ellis	<b>Title:</b> JFO, HM Community Planner JFO, HM Community Planner Region I Community Planner HM Community Planner	<b>Date:</b> 12/23/2011, 02/22/2012 03/12/2012, 03/30/2012 09/17/12, 3/1/2013 10/16/12
<b>Date Received in FEMA Region 1</b>	TA provided; Submitted 3/30/2012 Adopted final plan submitted 10/4/12	
<b>Plan Not Approved</b>		
<b>Plan Approvable Pending Adoption</b>	YES - APA notice issued 9/18/12	
<b>Plan Approved</b>	YES – 3/1/2012	

**SECTION 1:  
REGULATION CHECKLIST**

**INSTRUCTIONS:** The Regulation Checklist must be completed by FEMA. The purpose of the Checklist is to identify the location of relevant or applicable content in the Plan by Element/sub-element and to determine if each requirement has been ‘Met’ or ‘Not Met.’ The ‘Required Revisions’ summary at the bottom of each Element must be completed by FEMA to provide a clear explanation of the revisions that are required for plan approval. Required revisions must be explained for each plan sub-element that is ‘Not Met.’ Sub-elements should be referenced in each summary by using the appropriate numbers (A1, B3, etc.), where applicable. Requirements for each Element and sub-element are described in detail in this *Plan Review Guide* in Section 4, Regulation Checklist.

<b>1. REGULATION CHECKLIST</b>	<b>Location in Plan (section and/or page number)</b>	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>			
<b>ELEMENT A. PLANNING PROCESS</b>			
A1. Does the Plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction? (Requirement §201.6(c)(1))	Sec 4.1 p. 3-4, throughout plan	X	
A2. Does the Plan document an opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, agencies that have the authority to regulate development as well as other interests to be involved in the planning process? (Requirement §201.6(b)(2))	Sec 4.1 Sec 4.2 p.3-6	X	
A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))	Sec 4.1 p. 4	X	
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))	Sec 4.1 & 4.2 p. 4-6	X	
A5. Is there discussion of how the community(ies) will continue public participation in the plan maintenance process? (Requirement §201.6(c)(4)(iii))	Sec 4.2 p. 6	X	
A6. Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a 5-year cycle)? (Requirement §201.6(c)(4)(i))	Sec 4.2 p. 5-6,	X	

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan</b> (section and/or page number)	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
<b><u>ELEMENT A: REQUIRED REVISIONS</u></b>				
<b>ELEMENT B. HAZARD IDENTIFICATION AND RISK ASSESSMENT</b>				
B1. Does the Plan include a description of the type, location, and extent of all natural hazards that can affect each jurisdiction(s)? (Requirement §201.6(c)(2)(i))	Sec 5.1, pp 6-8 Sec 5.2, pp 8-21 Attachment - Map	X		
B2. Does the Plan include information on previous occurrences of hazard events and on the probability of future hazard events for each jurisdiction? (Requirement §201.6(c)(2)(i))	Sec 5.2, pp 8-21	X		
B3. Is there a description of each identified hazard's impact on the community as well as an overall summary of the community's vulnerability for each jurisdiction? (Requirement §201.6(c)(2)(ii))	Sec 5.2, pp 8-21	X		
B4. Does the Plan address NFIP insured structures within the jurisdiction that have been repetitively damaged by floods? (Requirement §201.6(c)(2)(ii))	Sec 5.2, p. 11	X		
<b><u>ELEMENT B: REQUIRED REVISIONS</u></b>				
<b>ELEMENT C. MITIGATION STRATEGY</b>				
C1. Does the plan document each jurisdiction's existing authorities, policies, programs and resources and its ability to expand on and improve these existing policies and programs? (Requirement §201.6(c)(3))	Sec 4.1, 4.2, 6.1, 6.2	X		
C2. Does the Plan address each jurisdiction's participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement §201.6(c)(3)(ii))	Sec 6.2, Sec 4.2 p.11	X		
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))	Sec 6.1 p. 21	X		
C4. Does the Plan identify and analyze a comprehensive range of specific mitigation actions and projects for each jurisdiction being considered to reduce the effects of hazards, with emphasis on new and existing buildings and infrastructure? (Requirement §201.6(c)(3)(ii))	Sec 6.2 pp 22-24	X		
C5. Does the Plan contain an action plan that describes how the actions identified will be prioritized (including cost benefit review), implemented, and administered by each jurisdiction? (Requirement §201.6(c)(3)(iv)); (Requirement §201.6(c)(3)(iii))	Sec 6.2 p. 23	X		

<b>1. REGULATION CHECKLIST</b>		<b>Location in Plan</b> (section and/or page number)	<b>Met</b>	<b>Not Met</b>
<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
C6. Does the Plan describe a process by which local governments will integrate the requirements of the mitigation plan into other planning mechanisms, such as comprehensive or capital improvement plans, when appropriate? (Requirement §201.6(c)(4)(ii))	Sec 4.2 , p.6 6, 1, p. 21	X		
<b><u>ELEMENT C: REQUIRED REVISIONS</u></b>				
<b>ELEMENT D. PLAN REVIEW, EVALUATION, AND IMPLEMENTATION</b> (applicable to plan updates only)				
D1. Was the plan revised to reflect changes in development? (Requirement §201.6(d)(3))	n/a – new plan			
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))	n/a – new plan			
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))	n/a – new plan			
<b><u>ELEMENT D: REQUIRED REVISIONS</u></b>				
<b>ELEMENT E. PLAN ADOPTION</b>				
E1. Does the Plan include documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval? (Requirement §201.6(c)(5))	In Attachments – p 33	X		
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))	This is a single plan.	n/a		
<b><u>ELEMENT E: REQUIRED REVISIONS</u></b>				
<b>ELEMENT F. ADDITIONAL STATE REQUIREMENTS (OPTIONAL FOR STATE REVIEWERS ONLY; NOT TO BE COMPLETED BY FEMA)</b>				
F1.				
F2.				
<b><u>ELEMENT F: REQUIRED REVISIONS</u></b>				

## SECTION 2: PLAN ASSESSMENT

### Element A: Planning Process

#### ***Plan Strengths:***

- The announcement that the draft update was available for public comment was published in a newsletter that reached over 150 people and businesses in 23 towns, including the adjacent towns.
- Future public comments will be reviewed by the town administrator and attached as an appendix to the plan.
- VT ANR will be invited to participate in plan updates because they can provide assistance with NFIP outreach activities, models for stricter floodplain zoning regulations, delineation of fluvial hazard areas, and other initiatives.

#### ***Opportunities for Improvement:***

- Consider involvement of the Emergency Management, building and/or town planning officials (if staffed beyond the Planning Commission), the floodplain manager and local historic preservation organizations.
- In addition to making the plan available for comment/review, consider inviting other stakeholders to participate in other stages of plan development (businesses, employers, tourism, farming and agriculture, utilities, etc.). Describe who these are in the Community Profile section.
- In the next update include in the appendices documentation of the planning process including sign-in sheets, minutes, any news articles.

### Element B: Hazard Identification and Risk Assessment

#### ***Plan Strengths:***

- The plan lists the types of community assets that are vulnerable to each hazard and uses dollar value of losses, based on past disasters or other estimates, to describe impact. The plan includes cost estimates of potential losses for all properties within the 100-yr floodplain, noted at \$34,225,800. In addition, the town notes fluvial erosion hazard zone, properties within that zone, 54 properties valued at \$6,577,200. The area was mapped by the state of VT.
- Data deficiencies were noted along with strategies for obtaining that type of data in the future.

***Opportunities for Improvement:***

- Explain the method used to estimate dollar losses for properties potentially damaged from flooding and fluvial erosion.
- Explain what kind of “structures” or “properties” are among those noted as within the designated floodplain and fluvial hazard erosion zone. Consider providing a breakdown by type/function for buildings and infrastructure (example - pump station, electrical substation), and the type of land use.
- It is not clear how the fluvial erosion zone information was gathered and how the Upper Winooski River Corridor Plan assessed such risks. The Corridor Plan map refers to the fluvial erosion hazard zones as proposed.
- The “Areas of Local Concern” map has details/background sections in the lower right that are unreadable. The place labels are likewise blurred. It is not possible to discern when these maps were produced; the source and timeliness of the data utilized; or other facts that are usually contained in such a ‘details’ area. Recommend improving maps or the scanned copies, so that all labels and text are legible.
- Identify the types and numbers of existing and future buildings, infrastructure and critical facilities located in the identified hazard areas.
- Describe the impacts of each hazard on vulnerable populations in addition to property.

**Element C: Mitigation Strategy**

***Plan Strengths:***

- Mention of incorporating mitigation planning into the town plan is indicated and will be part of long term land use and development planning documents.
- Mitigation actions are part of several community plans.
- The conservation overlay district limits development to protect natural resources and in some places may extend beyond the NFIP floodplain boundaries.
- The hazards are explicitly linked to the proposed mitigation actions.

***Opportunities for Improvement:***

- Consider semi-annual review of floodplain bylaws and ordinance requirements.
- Describe what the existing NFIP compliance issues are that will be corrected under the mitigation action plan.
- For actions with HMGP funding listed provide information about local matching funding source(s).
- The plan should provide more specific information regarding how the STAPLEE method was used to evaluate planning alternatives. Costs, town need, funding and economic impacts are mentioned without discussing details of how and who within the town weighted and prioritized mitigation actions (see pages 23-24). Consider including a matrix (table) in the appendix showing how each action was rated under each STAPLEE criteria. Explain the STAPLEE Method.

## Element D: Plan Update, Evaluation, and Implementation (*Plan Updates Only*)

### ***Recommendations for 5-Year Update:***

- For the plan's update, the Town will have an opportunity to further establish a baseline or foundation in which to reflect these changes in development and any trends over time. This change needs to clearly associate where and how these changes are occurring with respect to any increases or decreases in risk and vulnerabilities to the community. For example, the new condominiums and roads that were discussed. How does this new development impact the community's risk? Addressing development with regards to reducing risk should also take into account changes in codes, standards, regulations, policies in addition to land use, zoning, and population changes.
- Develop a description on the progress of the actions with insights that explain why some actions succeed and others did not or where no progress was made and how this is getting the Town closer to meeting its Mitigation Strategy goals. Putting the 2012 actions into a matrix along with the new actions and adding a column for "status" is an effective way to show this.
- Identify approaches that the community can take to celebrate their mitigation successes which demonstrate achieving their goals of long term hazard risk reduction.
- Also, be clear in how the priorities have changed over the planning period, if any.

## **B. Resources for Implementing Your Approved Plan**

Consider what actions can be funded by various governmental agencies (federal and state), especially when meeting multiple community goals. Federal agencies may support integrated planning efforts such as rural development, sustainable communities and smart growth, wildfire mitigation, conservation, etc. FEMA's RiskMAP may bring technical assistance resources rather than direct funding.

Seek out other non-governmental or non-emergency management funding sources such as from private organizations and businesses, federal initiatives (Smart Growth, Sustainable Communities), Federal Highways pilot projects, and historic preservation programs.

Refer to the Vermont State Hazard Mitigation Plan for more resources available to the local communities in Vermont.

In addition to looking into the Community Rating System (CRS), consider having your floodplain administrator become certified.

Research what bank stabilization or buffer program can be funded under the Clean Water Act.

Monitor upcoming NFIP training programs. Obtain and distribute informational brochures/publications, including FEMA F084; Answers to Questions About the NFIP and FEMA F-025; How the NFIP Works.

### **Technical Assistance**

FEMA's RiskMAP may bring technical assistance resources rather than direct funding <http://www.fema.gov/rm-main> . Technical assistance is available through Risk MAP to assist communities in identifying, selecting, and implementing activities to support mitigation planning and risk reduction. Attend any Risk MAP's discovery meetings that may be scheduled in the State (or neighboring communities with shared watersheds boundaries) in the future.

USDA, Natural Resources Conservation Service (NRCS)  
Conservation Technical Assistance

<http://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs/technical/cta>

Vermont Department of Environmental Conservation, Watershed Mgt. Division  
[http://www.vtwaterquality.org/rivers/htm/rv\\_floodhazard.htm](http://www.vtwaterquality.org/rivers/htm/rv_floodhazard.htm)

VT Department of Forests, Parks & Recreation  
Washington County Forester  
5 Perry Street, Suite 20  
Barre, VT 05641-4265  
Work Phone: 802-476-0172  
[http://www.vtfpr.org/htm/gen\\_staff.cfm](http://www.vtfpr.org/htm/gen_staff.cfm)

### **Grants**

Federal Funding Opportunities

<http://reconnectingamerica.org/resource-center/federal-grant-opportunities/>

U.S. Federal Grants, Search <http://www.grants.gov/\FEMA>

DHS/FEMA Hazard Mitigation Assistance Grant Program

<http://www.fema.gov/library/viewRecord.do?id=4225>

<http://www.fema.gov/library/viewRecord.do?fromSearch=fromsearch&id=2098>

<http://www.fema.gov/library/viewRecord.do?id=4225>

This program (administered by the State) provides funding for projects including:

- Soil Stabilization
- Infrastructure Retrofit (culverts & bridges)



- *Wildfire Mitigation*
- *Minor Localized Flood Reduction Projects*

*Individuals and businesses are not eligible to apply for HMA funds; however, an eligible applicant or subapplicant may apply for funding to mitigate private structures. Information for*

*Vermont Emergency Management, Hazard Mitigation  
HMGP Grant Guidance and Forms*

<http://vem.vermont.gov/programs/mitigation/forms>

*HUD CDBG Disaster Recovery Assistance*

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/comm\\_planning/communitydevelopment/programs/drsi](http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/communitydevelopment/programs/drsi)

*HUD provides flexible grants to help cities, counties, and States recover from Presidentially declared disasters, especially in low-income areas, subject to availability of supplemental appropriations.*

*CDBG Disaster Recovery grants primarily benefit low-income residents in and around communities that have experienced a natural disaster. Generally, grantees must use at least half of Disaster Recovery funds for activities that principally benefit low-and moderate-income persons. These can be either activities in which all or the majority of people who benefit have low or moderate incomes or activities that benefit an area or service group in which at least 51 percent of the population are of low- and moderate-income.*

*USDA Grants and Loans*

<http://www.vt.nrcs.usda.gov/programs/CIG/>

*USDA NRCS Conservation Innovation Grant Programs*

<http://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs>

### **Publications**

*The publications listed below are available free of charge and can be downloaded or ordered online from the websites referenced.*

*FEMA B-797, Hazard Mitigation Field Book – Roadways*

<http://www.fema.gov/library/viewRecord.do?fromSearch=fromsearch&id=4271>

*Flood Hazard Mitigation Handbook for Public Facilities*

<http://www.fema.gov/library/viewRecord.do?fromSearch=fromsearch&id=3724>

*FEMA 386-6, Mitigation Planning How To #6: Integrating Historic Property & Cultural Resource Considerations into Hazard Mitigation Planning*

<http://www.fema.gov/library/viewRecord.do?fromSearch=fromsearch&id=1892>

*FEMA P-787 Catalog of FEMA Wind, Flood & Wildfire Publications, Training Courses & Workshops(2012)*

<http://www.fema.gov/library/viewRecord.do?fromSearch=fromsearch&id=3184>

*The following publications can be ordered or downloaded from the referenced websites and distributed to the public. This type of distribution could be categorized as a mitigation action (Public Information Campaign) for your highest-rated hazards and combined with your other structural mitigation projects.*

*Above the Flood (FEMA 347) This is a fairly large publication (69 pages) and could be placed in the reference section of the public library or at the Town Hall for lending out.*

<http://www.fema.gov/library/viewRecord.do?fromSearch=fromsearch&id=1424>

*After Disaster Strikes: How to Recover Financially from a Natural Disaster (FEMA 292)*

<http://www.fema.gov/library/viewRecord.do?fromSearch=fromsearch&id=1647>

*After a Flood: The First Steps (FEMA L-198)*

<http://www.fema.gov/library/viewRecord.do?fromSearch=fromsearch&id=1684>

*Anchoring Home Fuel Tanks (FEMA 481)*

<http://www.fema.gov/library/viewRecord.do?fromSearch=fromsearch&id=2021>