

## LOCAL MITIGATION PLAN REVIEW TOOL

### Town of Bristol, Vermont

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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 Bristol, VT	<b>Title of Plan:</b> Town of Bristol, Vermont Single Jurisdiction All-Hazards Mitigation Plan Update	<b>Date of Plan:</b> 10/02/2018
<b>Single or Multi-jurisdiction Plan?</b> SINGLE		<b>New Plan or Plan Update?</b> UPDATE
<b>Regional Point of Contact:</b> Andrew L’Roe Addison County Regional Planning Commission  (802) 388-3141 <a href="mailto:alroe@acrpc.org">alroe@acrpc.org</a>		<b>Local Point of Contact:</b> Valerie Capels, Town Administrator Town of Bristol, VT  (802) 453-2410 <a href="mailto:townadmin@bristolvt.org">townadmin@bristolvt.org</a>

<b>State Reviewer:</b> Stephanie A. Smith	<b>Title:</b> VT Hazard Mitigation Planner	<b>Date:</b> 2/12/18; 3/26/18; 10/23/18
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<b>FEMA Reviewers:</b> Parker Moore Marie-Annette (Nan) Johnson Melissa Surette	<b>Title:</b> FEMA Region I Community Planner Region I Community Planner Senior Planner	<b>Date:</b> 4/11/2018 6/5/2018 10/24/18 – 11/13/18
<b>Date Received in FEMA Region I</b>	3/27/2018	
<b>Plan Not Approved</b>	Returned for Required Revisions	
<b>Plan Approvable Pending Adoption</b>	11/13/18	
<b>Plan Approved</b>		

**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</b> (section and/or page number)	<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))	Section 1, Pages 3-6 Annex A, p. 56-58 Acknowledgements, p. 78	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))	Section 1, Pages 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))	Section 1, Pages 3-6	X		
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))	Section 1.5, Pages 5-6	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))	Section 3.4 pages 52-54	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))	Section 3.4 Pages 52-54	X		
<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))	Section 2 Pages 15-34 Maps 8-12	X		

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<b>Regulation (44 CFR 201.6 Local Mitigation Plans)</b>				
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))	Section 2 Pages 15-34	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))	Section 2 Pages 15-34 Maps 8-12	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))	Section 3.2 Pages 39-40	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))	Section 1.6, p. 6-7 Section 1.8, p. 13-14 Section 3.2 Pages 38-42	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))	Section 3.2 Pages 39-40 Section 3.3 Page 45	X		
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))	Section 3 Page 38	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))	Section 3.3 Pages 45-50 Annex C	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))	Section 3.3 Pages 45-50 Section 3.3.1 Page 52	X		
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))	Section 1.8 Pages 13-14 Section 3.4 Pages 52-54	X		
<b><u>ELEMENT C: REQUIRED REVISIONS</u></b>				
<b>ELEMENT D. PLAN REVIEW, EVALUATION, AND IMPLEMENTATION (applicable to plan updates only)</b>				
D1. Was the plan revised to reflect changes in development? (Requirement §201.6(d)(3))	Section 1.6 Pages 6-7	X		
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))	Sections 3.3 Pages 51-52	X		

<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>				
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))	Sections 3.2 Pages 42-44 Section 3.3 Pages 51-52 Section 3.3.1 Page 52	X		
<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))	P. 55 – an unsigned copy of the adoption resolution has been provided.			
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 jurisdiction 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

### Recommended Corrections:

- Public Assistance dollars do not directly equal disaster damages sustained – Federal PA funds represent 75% of disaster related spending. Depending on the event type, actual disaster damages could be higher or lower than PA funds received.
- Annex C appears to be in need of an update (Potential Mitigation Project Funding Sources). Recommend consulting with the VT State Hazard Mitigation Officer for the most current funding source information.

### A. Plan Strengths and Opportunities for Improvement

This section provides a discussion of the strengths of the plan document and identifies areas where these could be improved beyond minimum requirements.

#### Element A: Planning Process

##### **Strengths:**

- Community Officials from numerous disciplines were involved in the planning process.
- A range of existing studies, reports, and plans were reviewed and incorporated as appropriate. [See comments below regarding using best current available information, data, reports, etc.]
- The main body of the plan references the appendices (annexes) making it easy for the reader to locate attached materials. [However see corrections needed above as the Table of Contents do not match the actual Annexes in the Plan.
- The criteria that will be used to update the plan are identified and post-disaster procedures were included.

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

- **A1.** The description in Section 1.1.2 (Current Plan Update Process) only informs the readers what the steps will be for an update. It does not describe how the update was done for each of these steps. Instead it was worked into the following Section 1.1.3 (*very briefly*) about public comment which did not meet the requirement. The plan must provide a description that explains when, how, what, and by whom the plan was updated. Meeting summaries and sign-in sheets, email or phone meeting notes, newspaper articles, etc. can be used to supplement the planning process documentation. The following questions are examples of statements in need of clarification or additional information.
- It seems there was only one initial meeting on 12/5/2017 to update the information and the second meeting occurred after the plan had already been submitted to the state- How specifically did the planning process occur for this plan update following the steps identified in Section 1.1.2?
- Other examples - Was the entire plan developed in one day at that meeting? How were the Town's last disasters and vulnerabilities reviewed and determined (only mentions hazards)? How were the Town's goals, capabilities, and plan integration with other planning

mechanisms discussed and decided? How were the actions evaluated and prioritized by the Committee with public and stakeholder involvement? What was the role of the RPC working with the Town?

- During the Selectboard meeting(s?) was the mitigation plan part of the agenda for providing information and making decisions with the public?
- Expand on the types of opportunities for public and stakeholder involvement. For ideas, see page 3-5 of FEMA's [Local Mitigation Handbook](#).
- Include more information on continued outreach to and feedback collected from stakeholders and the public.
- Consider ways in which to better structure the plan's content and convey stronger meaning, such as using more tables, graphics, etc.
- Recommend improving the understanding of what is and what was used for best current available information. The information provided leaves too much guessing as to what was updated to reflect a 2018 plan. Provide more statements, more dates, and more clarification throughout the plan to demonstrate the information is current.
- Utilize the 5 year Census data available between 2010-2020. Section 1.6 appears to be outdated referencing 1970-1990 figures. Reference what was used to review changes in development within the Town (e.g., building permits, development proposals, land use changes, adopted State Policies/Standards, Assessor's data, transportation planning reports, etc.).

## **Element B: Hazard Identification and Risk Assessment**

### ***Strengths:***

- The Plan incorporated its Geomorphic Assessments into the Risk Assessment and thus it's Strategy.
- The Vulnerability Statement for Landslide/Rockslide Hazards calls out a need for the State planning. The plan states "With an overall vulnerability score of 13, this hazard should be considered to be of statewide importance." Great communication with the SHMP!

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

- **B1.** Help the reader to understand what the hazard is by explaining what, for example, is a flash flood, wildfire, ice storm, etc. Recommend using the State Hazard Mitigation Plan as a starting point for obtaining and developing this information.
- **B2.** A strong foundation of historical events that have impacted the community assists in understanding risk and vulnerability and serves as the basis for the mitigation strategy. See page 5-4 of the [Local Hazard Mitigation Planning Handbook](#) for information and an example regarding this requirement.
- **B3.** See pages 5-10 to 5-15 of the above referenced mitigation planning handbook for examples on ways to meet this requirement and what information to consider including and conveying.
- Examine risk separately from current efforts. For example, while current response capabilities may be considered adequate for minimizing the effects of a disaster, there

could still be mitigation actions that would reduce the need to have as many response assets in the first place. Considering mitigation over response actions may result in a reduction of long-term risk and save resources over time.

- Create a more robust risk assessment by seeking additional stakeholder perspectives when defining community assets, problem areas, etc. Seek out additional information from sources such as the US Forest Service, the USGS, DOT/FHWS, EPA, NRCS, and the historical societies. State partnering agencies may also be helpful with some of the federal agency reports and studies. Consult the NE Region Climatic Assessment Report for future conditions.
- Power outages are considered a vulnerability to its natural or manmade hazards (such as breakage from high winds, flooding of power facilities, lightning strikes to transformers, etc.). Evaluating this and other such vulnerabilities as hazards affects the risk ratings.
- Incorporate additional information to better describe hazard extent. The purpose of describing extent is to assess the strength/magnitude of future events, in order to understand what severity can be expected. This is different from hazard impacts.
- The extent of fires can be somewhat difficult to describe as there is not a universally accepted scale. Some hazard factors to consider expressing the extent of fires (urban and wildfires) are size of the fire, topography and landscape, amount of time required to extinguish the fire, environmental factors (drought, wind, extreme temperatures), and the amount and types of resources required to extinguish the fire (usually expressed in number of 'alarms').
- Consider including the worst probable expected extent for the profiled hazards using a scale or other specific measurement (i.e. Cat 1 Hurricane, EF 2 Tornado, etc.).
- Be clear which hazards are being profiled in this update and why. Also, clearly explain the rationale from a risk perspective of why other hazards known to impact the jurisdiction are being omitted. The Town is encouraged to profile all its natural hazards to educate its community of what can impact the Town. The Town is also encouraged to then even address its man-made and technological hazards.
- Consider Plume type modeling for applicable Tier II and TRI facilities using CAMEO and ALOHA

### **Element C: Mitigation Strategy**

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

- The Town has successfully incorporated the Mitigation concepts from this Plan into its most recently adopted 2017 Town Plan. This is also the case for the Addison County RPC's 2016 Plan.
- The plan provides a description of the community's existing capabilities that relate to mitigation.
- The planning team reviewed a comprehensive list of different types of mitigation actions to help ensure that meaningful actions/projects for the community were selected.

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

- Expand upon the Plan’s description of current mitigation-related capabilities and the analysis of the opportunity to expand these capabilities (such as discussing barriers to expansion or improvement of these).
- Focus the plan’s goals on alleviating long-term risks and vulnerabilities. Recommend they be meaningful to the Town and written to easily incorporate into the Town’s Plan and vice versa.
- Provide more detail about the costs and benefits of each mitigation action. Consider describing other factors (social, technical, political, legal, environmental, etc.) involved.
- Include mitigation projects that would be possible if additional funding becomes available, such as during long-term recovery from a major disaster declaration.
- Clarify the Town’s specific sources of funding. Be sure the attachments that indicate funding resources is current.

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

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

- The Plan retained good continuity with the previous plan updates.
- Mitigation Actions and Priorities in the plan reflect a reassessment of the previous plan and current risk.

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

- During the five year planning period leading up to the next plan update consider ways to provide a baseline of the communities development in the identify hazard prone areas. This will help to identify changes in development for the update. This can include changes in land use, redevelopment and expansions, limited development or acquired properties in floodplains, changes in building codes or policies, new or improved roads and infrastructure, etc.
- Describe the effect that in progress or recently completed mitigation actions have had on reducing the community’s vulnerability.
- Ensure priorities are clear so that it will facilitate identifying any changes to these priorities for the next plan update.
- Describe general land use changes in neighboring communities that may affect risk in this community.
- Consider using a table or chart to describe the status of previous mitigation actions.
- Consider separating current status of actions from the mitigation strategy itself to avoid confusion.
- Design a template or tool to help monitor and evaluate the plan’s implementation and progress of meeting its goals through its actions. This can also be used for changes in vulnerabilities and risk over the next five year planning period.
- Highlight and Celebrate the Town’s successes! Provide insights as to what worked well and where challenges may have been faced.



## B. Resources for Implementing Your Approved Plan

### State Sources of Technical Assistance & Funding:

The Vermont State Hazard Mitigation Officer (SHMO) and State Mitigation Planner(s) can provide guidance regarding grants, technical assistance, available publications, and training opportunities. Contact the Vermont **Division of Emergency Management & Homeland Security** (VT DEMHS), the **Department of Environmental Conservation** (DEC), and the **Agency for Natural Resources** (ANR) for further assistance. View agency websites for contact information at <http://demhs.vermont.gov/plans> and <http://dec.vermont.gov/watershed/rivers/river-corridor-and-floodplain-protection> and <http://anr.vermont.gov/>. Refer to the Vermont State Hazard Mitigation Plan Update (Section 5.6) which identifies a number of potential funding sources for various mitigation activities [http://demhs.vermont.gov/sites/demhs/files/VT\\_SHMP2013%20FINAL%20APPROVED%20ADOPTED%202013%20VT%20SHMP.pdf](http://demhs.vermont.gov/sites/demhs/files/VT_SHMP2013%20FINAL%20APPROVED%20ADOPTED%202013%20VT%20SHMP.pdf). Communities are encouraged to work with the State to maximize use of every 406 Hazard Mitigation opportunity when available during federally declared disasters. A better alignment and increasing the effectiveness of 406 and 404 Mitigation funds, greatly benefit the community in the long run.

### Federal and Non-Profit Sources of Technical Assistance & Funding:

#### Federal Grants Resource Center and Grants.gov

Federal agencies may support integrated planning efforts such as rural development, sustainable communities and smart growth, climate change and adaptation, historic preservation, risk analyses, wildfire mitigation, conservation, Federal Highways pilot projects, etc. The Federal Grants Resource Center is located on the website of the national non-profit Reconnecting America, and provides a compilation of key funding sources for projects in your community. Examples are HUD, DOT/FHWA, EPA, and Sustainable Communities grant programs. For more information visit: <http://reconnectingamerica.org/resource-center/federal-grant-opportunities/> or [www.grants.gov](http://www.grants.gov).

#### GrantWatch.com

The website posts current foundation, local, state, and federal grants on one website. When seeking funding opportunities for mitigation, consider a variety of sources for grants, guidance, and partnerships, including academic institutions, non-profits, community organizations, and businesses, in addition to governmental agencies. Examples are The Partnership for Resilient Communities, the Institute for Sustainable Communities, the Rockefeller Foundation *Resilience*, The Nature Conservancy, The Kresge Climate-Resilient Initiative, the Threshold Foundation's *Thriving Resilient Communities* funding, the RAND Corporation, and ICLEI *Local Governments for Sustainability*.

<http://www.grantwatch.com>

#### FEMA Hazard Mitigation Assistance

FEMA's Hazard Mitigation Assistance provides funding for projects under the Hazard Mitigation Grant Program (HMGP), Pre-Disaster Mitigation (PDM), and Flood Mitigation Assistance (FMA). Individuals and businesses are not eligible to apply for HMA funds; however, an eligible applicant or subapplicant may apply on their behalf.

<http://www.fema.gov/hazard-mitigation-assistance>

### Recommended FEMA Publications & Websites:

#### Hazard Mitigation Planning Online Webliography, FEMA Region I

This compilation of government and private online sites is a useful source of information for developing and implementing hazard mitigation programs and plans in New England.

<http://www.fema.gov/about-region-i/about-region-i/hazard-mitigation-planning-webliography>

#### FEMA Library

FEMA publications can be downloaded for free from its Library website. This repository contains a wealth of information that can be especially useful in public information and outreach programs. Search by keyword to find documents related to a particular topic. Examples include building and construction techniques, the NFIP, integrating historic preservation and cultural resource protection with mitigation, and helpful fact sheets.

<http://www.fema.gov/library>

#### FEMA RiskMAP

Technical assistance is available through RiskMAP to assist communities in identifying, selecting, and implementing activities to support mitigation planning and risk reduction. Attend any RiskMAP discovery meetings that may be scheduled in the state (or neighboring communities with shared watersheds boundaries) in the future.

<https://www.fema.gov/risk-mapping-assessment-and-planning-risk-map>

#### FEMA Climate Change Website

Provides resources that address climate change.

<http://www.fema.gov/climate-change>

#### **Other Recommended Publications & Websites:**

##### U.S. Climate Resilience Toolkit

Scientific tools, information, and expertise are provided to help manage climate-related risks and improve resilience to extreme events. This aid assists planning through links to a wide-variety of web-tools covering topics, including coastal flood risk, ecosystem vulnerability, and water resources. Experts can be located in the NOAA, USDA, and Department of Interior.

<https://toolkit.climate.gov>

##### EPA's Resilience and Adaptation in New England (RAINE) Climate Change Program

A collection of vulnerability, resilience and adaptation reports, plans, and webpages at the state, regional, and community levels. Communities can use the RAINE database to learn from nearby communities about building resiliency and adapting to climate change.

<http://www.epa.gov/raine>

##### USDA Rural Community Development Grant Programs

USDA operates over fifty financial assistance programs for a variety of rural applications.

<http://www.rd.usda.gov/programs-services>

##### NOAA Sea Grant

Sea Grant's mission is to provide integrated research, communication, education, extension and legal programs to coastal communities that lead to the responsible use of the nation's ocean, coastal and Great Lakes resources through informed personal, policy and management decisions. Examples of the resources available help communities plan, adapt, and recovery are the *Community Resilience Map of Projects* and the *National Sea Grant Resilience Toolkit*, both located on this website.

<http://seagrant.noaa.gov>

##### USDA, Natural Resources Conservation Service (NRCS)

Provides conservation technical assistance, financial assistance, and conservation innovation grants.

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

##### The Rockefeller Foundation Resilience

Helping cities, organizations, and communities better prepare for, respond to, and transform from disruption.

<https://www.rockefellerfoundation.org/our-work/topics/resilience/>