



FEMA

March 13, 2013

Andrew Cunningham, Chair
Warren Board of Selectmen
Warren Municipal Building
42 Cemetery Road, PO Box 337
Warren, VT 05674

Dear Mr. Cunningham:

Thank you for the opportunity to review the Town of Warren, VT Hazard Mitigation Plan. The Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA) Region I has evaluated the plan for compliance with 44 CFR Part 201. The plan satisfactorily meets all of the mandatory requirements set forth by the regulations. Congratulations on this achievement!

With this plan approval, the Town is eligible to apply for Mitigation grants administered by FEMA. Requests for mitigation funding will be evaluated individually according to the specific eligibility and requirements of each of these programs. Furthermore, a specific mitigation activity or project identified in your community's plan may not meet the eligibility requirements for FEMA funding, and even eligible mitigation activities are not automatically approved for FEMA funding. In addition, approved mitigation plans are eligible for points under the National Flood Insurance Program's Community Rating System (CRS). Complete information regarding the CRS can be found at www.fema.gov/business/nfip/crs.shtm or through your local floodplain manager.

The Town's Hazard Mitigation Plan must be reviewed, revised as appropriate, and resubmitted to FEMA for approval within **five years of the plan approval date of March 11, 2013** in order to maintain eligibility as an applicant for mitigation grants. Over the next five years, we encourage the town to continue updating the plan's assessment of vulnerability, adhere to its maintenance schedule, and begin implementing, when possible, the mitigation actions proposed in the plan.

Once again, thank you for your continued dedication to public service demonstrated by preparing and adopting a strategy for reducing future disaster losses. Should you have any questions, please do not hesitate to contact Marilyn Hilliard at (617) 956-7536.

Sincerely,

Paul F. Ford
Acting Regional Administrator

PFF:mh

cc: Ray Doherty, Vermont Hazard Mitigation Officer
Rob Evans, National Flood Insurance Coordinator
Jennifer Mojo, Central Vermont Regional Planning Commission

Enclosure

Cindi Jones

From: Doherty, Ray [Ray.Doherty@state.vt.us]
Sent: Wednesday, March 20, 2013 8:47 AM
To: Cindi Jones; Laurie Emery
Cc: currier@cvregion.com
Subject: Warren, VT- Local Plan- FEMA formal approval letter and review tool
Attachments: VT_Warren_Final_PLAN REVIEW TOOL.docx; Warren VT FORMAL APPROVAL.pdf

Laurie, Dan and Cindi,

Good morning. I am pleased to inform you that FEMA has approved the local mitigation plan for the town of Warren (please see attachments). The plan is good for 5 years from the approval date of March 11, 2013.

Sincerely,

Ray Doherty, State Hazard Mitigation Officer
Vermont Division of Emergency Management & Homeland Security
103 South Main Street
Waterbury, VT 05671
Tel (802) 241-5258 (office)
Fax (802) 241-5556
Email: ray.doherty@state.vt.us

From: Costa, Norma [<mailto:Norma.Costa@fema.dhs.gov>]
Sent: Wednesday, March 20, 2013 8:38 AM
To: Doherty, Ray; 'mojo@cvregion.com'
Subject: Warren VT formal approval letter and review tool

LOCAL MITIGATION PLAN REVIEW TOOL

Town of Warren, VT - Final Plan

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*.

Jurisdiction: Town of Warren, VT	Title of Plan: Town of Warren, VT Local Hazard Mitigation Plan Update	Date of Plan: Final April 13, 2012 - Adopted December 11, 2012
Single or Multi-jurisdiction: SINGLE		New Plan Update: UPDATE
Regional Point of Contact: Jennifer Mojo		Local Point of Contact: Andrew Cunningham, Select Board Chair PO Box 337 Warren Municipal Building 42 Cemetery Road Warren, VT 05674
Title: Regional Planner		
Agency: Central Vermont Regional Planning Commission 29 Main Street, Suite 4 Montpelier, VT 05602		Email: selectboard@warrenvt.org Telephone: Telephone (802) 496-2709
Phone Number: 802-229-0389 E-Mail: mojo@cvregion.com		Cindi Hartshorn-Jones, Town Administrator Telephone (802) 496-2709 X23

State Reviewer: Ray Doherty	Title: VT SHMO	Date:
FEMA Reviewer: Martha Smithpeters Mary Cox Nan Johnson Barbara Ellis	Title: HM Community Planner HM Community Planner Region I Community Planner HM Community Planner	Date: 1/7/12 3/29/2012 & 4/2/2012 11/29/12, 3/6-3/11/2013 2/26/12
Date Received in FEMA Region I	Technical Assistance Provided - 4/13/2012; Final Plan w/Adoption received 12/12/12; correction rec'd 3/8/2013	
Plan Not Approved		
Plan Approvable Pending Adoption	Yes – APA issued 12/4/2012	
Plan Approved	Yes – 3/11/2013	

**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.

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
ELEMENT A. PLANNING PROCESS				
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))	p. 4-6		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))	p. 4-6		X	
A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))	p. 5-6		X	
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))	p. 6-8 p. 8-9		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))	p. 8-9, 31		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))	p.8-9, 31		X	
ELEMENT A: REQUIRED REVISIONS				

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
ELEMENT B. HAZARD IDENTIFICATION AND RISK ASSESSMENT				
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))	p. 9-10	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))	p. 11-19	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))	p. 9-19	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))	p. 12 No rep loss properties	X		
<u>ELEMENT B: REQUIRED REVISIONS</u>				
ELEMENT C. MITIGATION STRATEGY				
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))	p. 7-8, 19	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))	p 3, 4, 7, 12, 20-21	X		
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))	p. 19	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))	p. 20-21	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))	p. 22	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))	p. 9	X		
<u>ELEMENT C: REQUIRED REVISIONS</u>				

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
ELEMENT D. PLAN REVIEW, EVALUATION, AND IMPLEMENTATION (applicable to plan updates only)				
D1. Was the plan revised to reflect changes in development? (Requirement §201.6(d)(3))	p. 3-5, 9-18	X		
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))	p. 6-8	X		
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))	p. 5-7	X		
<u>ELEMENT D: REQUIRED REVISIONS</u>				
ELEMENT E. PLAN ADOPTION				
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))	Attachment, p. 32	X		
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))	N/A – This is a single jurisdictional plan.	N/A		
<p>Note: Refer to the FEMA Mitigation Planning Guidance regarding adoption language for the resolution. This adoption resolution could be further strengthened to demonstrate the community's understanding and commitment to mitigation and the planning process.</p>				
ELEMENT F. ADDITIONAL STATE REQUIREMENTS (OPTIONAL FOR STATE REVIEWERS ONLY; NOT TO BE COMPLETED BY FEMA)				
F1.				
F2.				
<u>ELEMENT F: REQUIRED REVISIONS</u>				

SECTION 2: PLAN ASSESSMENT

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

Plan strengths:

- Detailed description of the update planning process, including involvement of the public, neighboring communities, local and neighboring businesses, and other stakeholders.
- The draft update was posted on the CVRPC blog and newsletter, and copies were available at the Warren municipal offices, and upon request from CVRPC.
- Incorporated current data, priorities, and issues (including the Warren Municipal Plan, Zoning Regulations, the Warren Rapid Response Plan 2006, and the Mad River Fluvial Geomorphology Assessment -2007) into the update.
- The future planning process specifies expanded opportunities for public involvement through public notices including in the Valley Reporter, and identifies specific stakeholders and agencies (Sugarbush, village business owners, and VT ANR) to be invited to planning meetings.

Opportunities for improvement:

- For the next update, recommend including more specific documentation of opportunities for public, other agency, and stakeholder involvement in the planning process (e.g. copies of meeting minutes, sign-in sheets, newspaper notices, newsletter notices, blog entries, website pages).
- Consider inviting the Warren Historical Society to be involved in evaluating and updating the plan over the next five years (p. 9). The FEMA "How-To" Guide #6 (FEMA 386-6) shows communities, step by step with the needed tools and resources, how to develop and then implement a pre-disaster planning strategy for historic properties and cultural resources. <http://www.fema.gov/library/viewRecord.do?id=1892>
- See recommendation above in checklist regarding the plan's adoption resolution.

Element B: Hazard Identification and Risk Assessment

Plan strengths:

- The Plan includes a nicely detailed analysis of those hazards which pose the most significant threat to the Town of Warren.
- Good specificity with respect to precise locations, buildings, and infrastructure which are

particularly vulnerable to each of the identified high and moderate-threat hazards.

Opportunities for improvement:

- The draft Update does not state how the “Community Vulnerability” for each hazard was determined (other than a binary “yes” if the hazard presents the threat of disaster or “no” if just a routine emergency). Although the plan meets requirements for setting forth a summary of vulnerability for each of the medium- to high-threat hazards, with specific locations, buildings, and infrastructure identified for each, consider the intermediary step of assessing and documenting overall community vulnerability based on:
 - Future development trends (state the vulnerability of future development to the identified hazards);
 - Best available data (flood maps, HAZUS, flood studies) to describe significant hazards;
 - Techniques and methodologies to estimate dollar losses to vulnerable structures;
 - Risk MAP products (i.e., depth grids, Flood Risk Report, Changes Since Last FIRM, Areas of Mitigation Interest, etc.);
 - Identification of any data gaps that can be filled as new data became available; and,
 - Expanded input and perspectives of what the vulnerabilities are seen to be by a wider representation of the community through greater involvement in the planning process.
- Provide clear explanations how the changes in development and trends were analyzed for all hazards. Note the changes in development and how this is affecting risk reduction.
- Recommend more clearly documenting risk to people, property, and infrastructure through tables, charts, maps, photos, etc. within the plan.
- Recommend more clearly referencing information sources.

Element C: Mitigation Strategy

Opportunities for improvement:

- Recommend including strategies and actions relating specifically to historic buildings and infrastructure, and particularly vulnerable structures and those at environmentally sensitive locations. Having a good range of stakeholders involved in the process will improve these other perspectives and can lead to other strategies and resources.
- Recommend stating the FIRM date within the HM plan.
- Three of the “hazard mitigation strategies related to the goals of the plan” on page 19 can be read as preparedness strategies. These may not support the purpose of this plan without the distinction between short term preparedness actions and those that address the problem(s) with long term mitigation actions. Continue to clarify the role of preparedness actions such as communication equipment, generators, response plans from mitigation actions. Ensuring that the communication systems are not destroyed or damaged by the identified hazards through long term solutions is an example of good mitigation.

- Maintenance, repair, and replacements without improvement that address the problem is not considered mitigation. Repairs to structures without improvement to prevent or eliminate the vulnerability to the identified hazards are temporary fixes. A step more towards mitigation can also consider maintenance in a greater context of a program that is permanently funded or implemented for the long term.
- The single goal provided for this Hazard Mitigation Plan might be expanded and separated into several broad goals. The town might consider the economic cost of community disruption by hazard events. Also, incorporate the overarching goal of hazard mitigation into the comprehensive Town Plan.

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

Plan Strengths:

- The annex describes plan maintenance to include annual monitoring, evaluation, and interim amendments prior to a formal update prior to the five-year cycle ending. The town will update the Hazard Mitigation Plan as new updated town planning strategies, zoning, and river corridor plans become available.
- The plan recommends that elements of the Local Hazard Mitigation Plan be incorporated into updates of the municipal plan, zoning regulations and flood hazard/fluvial erosion hazard bylaws.
- The town administrator will coordinate plan monitoring, evaluation, updating, and implementation. Plan monitoring and implementation will be undertaken along with the Select board.

Opportunities for Improvement:

- Recommend more clearly addressing the outcome of all actions/projects from prior approved plans within plan updates. Explain the progress with greater meaning on how each action met the timeframes/targets from the last planning period to evaluate changes in the long term risk over time and if meeting the mitigation goals. Measures that are too broad and undefined often use “2011-2016, ongoing, continuing, in progress, carried over” as its timeline are not effective measures of risk reduction. Continue to develop and refine the strategies so that they are defined yet not necessarily so project specific as to limit the strategy.
- Recommend developing a “baseline” of current development, such as population, building permits, growth rates, and land use, etc. This can then be used to compare changes over time and between plan updates.
- Recommend expanding the explanation of development changes occurring within the community’s hazard areas. This might include information on/from business expansions, construction/building and septic permits, development/subdivision plans, master plans, changes in use (including summer homes to year round homes, increased density), rezoning and land use map changes, acquisitions (taking structures/existing development out of use), foreclosures, new business or tourism opportunities; changes in codes, regulations, and zoning policies, as well as infrastructure improvements or expansions to utilities and transportation.

Note: Ensure that the vulnerability assessment is updated to reflect changes in risk. If community vulnerability is not changed by development, the updated plan should confirm that.

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, foundations, and businesses. Also consider other federal initiatives (Smart Growth, Sustainable Communities), Federal Highways pilot projects, and historic preservation programs.

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

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*

*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*

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.

For further information:

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

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>