



**FEMA**

MAR 19 2019

Whitney Welch  
State Hazard Mitigation Officer  
NH Department of Safety  
Homeland Security and Emergency Management  
33 Hazen Drive  
Concord, NH 03303

Dear Ms. Welch:

As outlined in the FEMA-State Agreement for FEMA-DR-4316, your office has been delegated the authority to review and approve local mitigation plans under the Program Administration by States Pilot Program. Our Agency has been notified that your office completed its review of the Nelson Hazard Mitigation Plan Update 2019 and approved it effective **March 8, 2019** through **March 7, 2024** in accordance with the planning requirements of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended, the National Flood Insurance Act of 1968, as amended, and Title 44 Code of Federal Regulations (CFR) Part 201.

With this plan approval, the jurisdiction is eligible to apply to New Hampshire Homeland Security and Emergency Management for mitigation grants administered by FEMA. Requests for mitigation funding will be evaluated according to the specific eligibility requirements identified for each of these programs. A specific mitigation activity or project identified in your community's plan may not meet the eligibility requirements for FEMA funding; even eligible mitigation activities or projects are not automatically approved.

The plan must be updated and resubmitted to the FEMA Region I Mitigation Division for approval every five years to remain eligible for FEMA mitigation grant funding.

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 contact Melissa Surette at (617) 956-7559 or [Melissa.Surette@fema.dhs.gov](mailto:Melissa.Surette@fema.dhs.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul F. Ford", is written over a horizontal line.

Paul F. Ford  
Acting Regional Administrator

PFF: ms

cc: Fallon Reed, Chief of Planning, New Hampshire  
Kayla Henderson, Hazard Mitigation Planner, New Hampshire

## APPENDIX A:

### LOCAL MITIGATION PLAN REVIEW TOOL

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 or the New Hampshire State Plan Reviewer'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 or the New Hampshire State Plan Reviewer's must reference this *Local Mitigation Plan Review Guide* when completing the *Local Mitigation Plan Review Tool*.

<b>Jurisdiction:</b> Town of Nelson, NH	<b>Title of Plan:</b> Nelson Hazard Mitigation Plan Update 2019 <b>Type of Plan (Single/Multi):</b> Single	<b>Date of Plan:</b> 2019 <b>New Plan or Update:</b> <u>Update</u> <b>Plan Adopted:</b>
<b>Local Point of Contact:</b> Dennis Dellagrecia <b>Title:</b> Emergency Management Director <b>Agency:</b> Nelson, NH <b>Phone Number:</b> (603) 847-0047 <b>E-Mail:</b> <a href="mailto:wildcatledges@aol.com">wildcatledges@aol.com</a>		<b>Board of Selectmen:</b> David Upton <b>Title:</b> Chair <b>Agency:</b> Town of Nelson <b>Phone Number:</b> (603) 847-0047 <b>E-Mail:</b> <a href="mailto:execadmin@nelsonnh.us">execadmin@nelsonnh.us</a>
<b>Regional Point of Contact:</b> Lisa Murphy <b>Title:</b> Senior Planner <b>Agency:</b> Southwest Region Planning Commission <b>Phone Number:</b> (603)357-0557 <b>E-Mail:</b> <a href="mailto:lmurphy@swrpc.org">lmurphy@swrpc.org</a>		<b>Address:</b> Southwest Region Planning Commission 37 Ashuelot Street Keene, NH 03431
<b>State Reviewer:</b> Kayla Henderson	<b>Title:</b> State Hazard Mitigation Planner <b>E-Mail:</b> <a href="mailto:Kayla.Henderson@dos.nh.gov">Kayla.Henderson@dos.nh.gov</a>	<b>Date:</b> 3/8/19

<b>Date Received at HSEM :</b>	1/9/2019
<b>Plan Not Approved:</b>	
<b>Plan Approvable Pending Adoption:</b>	1/18/2019
<b>Plan Approved:</b>	3/8/2019



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)				
<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))		Ch.1 pp.6-9 Appendix E	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))		Ch. 1 pp. 6-9 Appendix E	X	
A3. Does the Plan document how the public was involved in the planning process during the drafting stage? (Requirement §201.6(b)(1))		Ch. 1 pp. 6-9 Appendix E	X	
A4. Does the Plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement §201.6(b)(3))		Ch. 1 pp. 6-10; Ch. 2 pp. 11-14; Ch. 3 pp. 15-27; Ch. 5 p.30; Ch. 7 pp. 37-40; Ch. 8 p.41-44; Ch. 9 p.45-46; Ch. 10 p. 47-48; Appendix C	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))		10 p. 47-48	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))		10 p. 47-48	X	
<b>ELEMENT A: REQUIRED REVISIONS</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))		Ch. 3 pp. 15-27; Ch.4 p. 29; Ch. 5 pp. 30-33; Appendix A	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))		Ch. 3 pp. 15-27; Ch.4 p. 29; Ch. 5 pp. 30-33; Appendix B	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))		Ch. 3 pp. 15-27; Ch.4 p. 29; Ch. 5 pp. 30-33; Appendix A & B	X	

## Nelson Hazard Mitigation Plan Update 2019

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
B4. Does the Plan address NFIP insured structures within the jurisdiction that have been repetitively damaged by floods? (Requirement §201.6(c)(2)(ii))	Ch. 2 p. 14	X		
<b>ELEMENT B: REQUIRED REVISIONS:</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))	Ch. 7 pp. 37-40	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))	Ch. 2 pp. 14	X		
C3. Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement §201.6(c)(3)(i))	Ch. 1 p. 10	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))	Ch. 8 pp.41-44	X		
C5. Does the Plan contain an action plan that describes how the actions identified will be prioritized ( <b>including cost benefit review</b> ), implemented, and administered by each jurisdiction? (Requirement §201.6(c)(3)(iv)); (Requirement §201.6(c)(3)(iii))	Ch. 9 pp. 45-46	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))	Ch. 10 pp. 47-48	X		
<b>ELEMENT C: REQUIRED REVISIONS:</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))	Ch. 1 p.10; Ch. 2 pp. 11-14; Ch. 7 pp.37-40; Ch. 8 pp. 41-44; Ch. 9 pp. 45-46	X		
D2. Was the plan revised to reflect progress in local mitigation efforts? (Requirement §201.6(d)(3))	Ch. 1 p.10; Ch. 2 pp. 11-14; Ch. 7 pp.37-40; Ch. 8 pp. 41-44; Ch. 9 pp. 45-46	X		
D3. Was the plan revised to reflect changes in priorities? (Requirement §201.6(d)(3))	Ch. 7 pp.37-40; Ch. 8 pp. 41-44; Ch. 9 pp. 45-46	X		
<b>ELEMENT D: REQUIRED REVISIONS</b>				
<b>ELEMENT E. PLAN ADOPTION</b>				



## Nelson Hazard Mitigation Plan Update 2019

1. REGULATION CHECKLIST		Location in Plan (section and/or page number)	Met	Not Met
Regulation (44 CFR 201.6 Local Mitigation Plans)				
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))		Ch. 10 pp. 49	X	
E2. For multi-jurisdictional plans, has each jurisdiction requesting approval of the plan documented formal plan adoption? (Requirement §201.6(c)(5))				
<b>ELEMENT E: REQUIRED REVISIONS</b>				
<b>ELEMENT F. ADDITIONAL STATE REQUIREMENTS (OPTIONAL FOR STATE REVIEWERS ONLY; NOT TO BE COMPLETED BY FEMA)</b>				
F1.				
F2.				
<b>ELEMENT F: REQUIRED REVISIONS</b>				

## SECTION 2: PLAN ASSESSMENT

**INSTRUCTIONS:** The purpose of the Plan Assessment is to offer the local community more comprehensive feedback to the community on the quality and utility of the plan in a narrative format. The audience for the Plan Assessment is not only the plan developer/local community planner, but also elected officials, local departments and agencies, and others involved in implementing the Local Mitigation Plan. The Plan Assessment must be completed by FEMA. The Assessment is an opportunity for FEMA to provide feedback and information to the community on: 1) suggested improvements to the Plan; 2) specific sections in the Plan where the community has gone above and beyond minimum requirements; 3) recommendations for plan implementation; and 4) ongoing partnership(s) and information on other FEMA programs, specifically RiskMAP and Hazard Mitigation Assistance programs. The Plan Assessment is divided into two sections:

1. Plan Strengths and Opportunities for Improvement
2. Resources for Implementing Your Approved Plan

**Plan Strengths and Opportunities for Improvement** is organized according to the plan Elements listed in the Regulation Checklist. Each Element includes a series of italicized bulleted items that are suggested topics for consideration while evaluating plans, but it is not intended to be a comprehensive list. FEMA Mitigation Planners are not required to answer each bullet item, and should use them as a guide to paraphrase their own written assessment (2-3 sentences) of each Element.

The Plan Assessment must not reiterate the required revisions from the Regulation Checklist or be regulatory in nature, and should be open-ended and to provide the community with suggestions for improvements or recommended revisions. The recommended revisions are suggestions for improvement and are not required to be made for the Plan to meet Federal regulatory requirements. The italicized text should be deleted once FEMA has added comments regarding strengths of the plan and potential improvements for future plan revisions. It is recommended that the Plan Assessment be a short synopsis of the overall strengths and weaknesses of the Plan (no longer than two pages), rather than a complete recap section by section.

**Resources for Implementing Your Approved Plan** provides a place for FEMA to offer information, data sources and general suggestions on the overall plan implementation and maintenance process. Information on other possible sources of assistance including, but not limited to, existing publications, grant funding or training opportunities, can be provided. States may add state and local resources, if available.

### 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:**

The addition of agendas and sign in sheets are a great way to show who participates and in what parts of the plan. This is another great way to show involvement and the overall process for updating this plan.

**Opportunities for Improvement:**

It would be great to see more involvement from the public or surrounding communities. Maybe a different method of public notice could be given for the next review to help bring those parties to the table.

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

**Plan Strengths:**

Always helpful to have maps included with the plan to help show a broader view of where some vulnerabilities might be and how they might interact with one another.

Great list of resources in the appendices for the plan reader and committee to explore if wanted or needed.

**Opportunities for Improvement:**

Would love to see more about the Nubanusit Dam as it is classified as a Significant Dam and it mentions "There are 4 residences located in this area that have been affected or have the potential to be affected by flood waters." Does the community have communication with the dam owner?

Suggest sorting hazard probability/risk on page 29 in order from Very High to Very Low to make it easier to read where the scores and rankings fall in regard to one another.

#### Element C: Mitigation Strategy

**Plan Strengths:**

Great to see a specific long term mitigation action item like "replace the baily brook bridge". This is the type of mitigation action item that could mitigate a bigger problem and could be a great project to apply for HMGP funding for if available.

**Opportunities for Improvement:**

Suggest more specific mitigation actions for some of the identified hazards such as those ranked as High and Medium threats to the community. A handful of the action items seems preparedness focused over mitigation, such as updating plans. Think outside of the box for ways to mitigate the root of the problems in town for good.

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

## Nelson Hazard Mitigation Plan Update 2019

### **Plan Strengths:**

I like Appendix G that has a section attached to the plan to help track the project status. Any tools that can be provided in the plan to help facilitate an easier update next time around are great. Another tool like this to track weather events that affect the community would be a great addition as well.

### **Opportunities for Improvement:**

Could be more specific in what tasks should be done in follow up meetings, such as the annual review, to help guide the team when reviewing in the future.

