



## FEMA Requirement C3: Goals Based on Vulnerabilities

### Does the Plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards?

Local Mitigation Plan Review Guide, FEMA, 2011, page 24

This “Good Practice” document is intended to help plan developers understand the FEMA requirement related to developing hazard mitigation goals. Plan developers don’t often trip up on this particular requirement sufficiently to warrant return of the plan for revisions. However, most miss the opportunity to make their goals an integral part of their strategy to implement and evaluate the plan.

### Common Reasons Why FEMA Returns Plans for C3 Revisions

1. Only goals from the jurisdiction’s comprehensive, master, or other plan are described without stating if these are also the *mitigation* goals for the hazard mitigation plan.  
**Tip:** When integrating goals from other community plans into the hazard mitigation plan clearly state whether these will also serve as the community’s hazard mitigation goals.
2. The goals do not encompass all of the vulnerabilities identified by the plan as associated with the hazards most important to the community.  
**Tip:** Focus goals on the specific problem statements identified in the community’s risk assessment. If any profiled hazard does not pose significant vulnerabilities, explain whether, as a result, the goals do not cover the hazard.  
**Tip:** Tailor the goals to local conditions and the array of objectives needed to achieve the community’s goals for mitigation rather than simply repeating general goals contained in the state hazard mitigation plan or other source.
3. Goals are not clearly differentiated between mitigation (i.e., long-term, sustained measures to reduce damages and impacts) and non-mitigation goals for preparedness and response. The plan needs to emphasize mitigation goals and correctly identify these. Non-mitigation emergency management goals and actions are not considered as meeting hazard mitigation requirements.

**Note:** Occasionally prevention, a type of mitigation measure, is confused with preparedness and response. An example of prevention would be to adopt a stronger building code to prevent structural failures. Preparedness and response measures can prevent impacts, but in a shorter, limited timeframe and often repeatedly. For instance, traffic barriers erected to prevent vehicles from entering a dangerous area, which does not reduce the actual hazard condition.

**Tip:** It is acceptable to include emergency management goals and actions into a mitigation plan but remember to distinguish those from the mitigation goals. This integration helps communities promote coordination among the local entities responsible for mitigation, emergency preparedness, and response.

## Plans Demonstrating Good Practice for Requirement C3

This section provides two examples of plans from Dennis, MA and Windham, VT. These abstracts are intended to illustrate good practices in meeting the requirements.

The abstracts are preceded by a brief explanation why these plan sections meet the requirements. In addition, practices going “Beyond Minimum Requirements” are noted. Many other approaches are possible, so don’t be limited by these examples; the approach taken should fit the particular circumstances of the community.

### **Example 1: *Dennis, Massachusetts, Multi-Hazard Mitigation Plan (1/2016 Draft Update)***

#### **Why This Plan Demonstrates Good Practice**

1. The draft goals and objectives were revised from the town’s 2010 plan; they are based upon vulnerabilities currently of greatest concern to the town, as identified in the risk and vulnerability assessment within the local plan update. Each is locally appropriate and specific.
2. The general goals are accompanied by objectives that represent the breadth of vulnerabilities for both existing and new development (e.g., critical facilities, environmental values, repetitive losses, funding, and public awareness).

**Beyond Minimum Requirements:** The goals and objectives are based on social and environmental values, social desires, historic preservation concerns, and/or state mitigation priorities and funding considerations. These go beyond a general desire to “protect property and people from damages and harm.”

**Beyond Minimum Requirements:** Some of the goals and objectives are measurable, which will help the community evaluate plan performance and mitigation progress. For instance, the plan calls for decreasing the number of repetitive loss properties and ensuring that all critical facilities are protected.

3. The goals are achievable within the next five years (prior to the next plan update).  
**Tip:** Longer term goals, such as those related to climate change, may be included, as long as they encompass a part of the strategy that will be the focus of the 5-year planning cycle.

See Abstract below. Please read a clarification for Goal 2 provided in a FEMA Note.

Abstract from Section 4.1

***Dennis, Massachusetts, Multi-Hazard Mitigation Plan (1/ 2016 Draft Update)***

**4.1 Mitigation Objectives**

The following objectives have been formulated to support and to correspond directly with the Community Goals in Section 1. These objectives have been developed also to provide the Town with measurable short-term milestones.

• **Goal #1:** *Reduce the loss of life, property, infrastructure, and environmental and cultural resources in the Town from natural disasters.*

1a. Preserve the natural and beneficial functions of the town's floodplain, wetlands, beaches and dunes through continued support of natural resource protection policies and by discouraging growth in environmentally sensitive areas.

1b. Enhance the Town's capability to conduct hazard risk assessments, demonstrate funding needs, and track mitigation activities throughout town (whether directly as part of this plan, or indirectly through the normal course of business).

1c. Ensure that all new construction is completed using wind-resistant design techniques that will limit damage caused by high winds and reduce the amount of wind-borne debris.

1d. Ensure that all municipal structural mitigation measures be coordinated with Town Boards and Commissions to review a project's sensitivity to natural features, historic resources and community character.

• **Goal #2:** *Coordinate local hazard mitigation planning and activities with those of Barnstable County and neighboring towns.*

FEMA Note: The town's two draft objectives for Goal 2 are not included here to avoid confusion because they are related to preparedness.

*Continued on next page...*

## Abstract from Section 4.1

***Dennis, Massachusetts, Multi-Hazard Mitigation Plan (1/2016 Draft Update)****Continued:*

• **Goal #3:** *Seek for and take advantage of funding opportunities to implement the Multi-Hazard Mitigation Plan.*

3a. Maximize the use available hazard mitigation grant programs to protect the Town's most vulnerable populations and structures.

3b. Make use of available land preservation funds, including Community Preservation Act funding, to acquire critical repetitive loss parcels to return to open space.

3c. Coordinate with state and other agencies to acquire funding that can be targeted to low income homeowners living within the flood zone, to subsidize the elevating of flood prone structures.

• **Goal #4:** *Mitigate potential financial losses incurred by municipal, residential and commercial establishments due to disaster.*

4a. Ensure that all critical facilities are protected from the effects of natural hazards to the maximum extent possible.

4b. Ensure that new construction within high hazard areas are completed using wind-resistant design techniques that will limit damage caused by high winds and reduce the amount of wind-borne debris.

4c. Decrease the number of FEMA-identified "repetitive loss properties." As of December 2015, five of the eighteen identified repetitive loss properties have taken steps to mitigate.

• **Goal #5:** *Develop and conduct hazard awareness information and educational programs for the public.*

5a. Increase the level of knowledge and awareness for Town residents on the hazards that are potential threats to the area.

5b. Educate property owners on the affordable, individual mitigation and preparedness measures that can be taken before the next hazard event.

5c. Educate Town staff on cost-effective, mitigation and preparedness measures that can be taken before the next hazard event.

**Example 2: *Town of Windham, VT, Local Hazard Mitigation Plan (2015)*****Why This Plan Demonstrates Good Practice**

1. Goals 1 and 2 are based upon problem statements expressing the specific vulnerabilities deemed most important by the community.  
**Beyond Minimum Requirements:** Both of these goals have measurable outcomes.
2. The more general ongoing goals address desired outcomes ranging from reducing damages and mitigating infrastructure, to integrating mitigation in other community mechanisms while ensuring continued public participation in mitigation planning.
3. **Beyond Minimum Requirements:** The plan describes how (by consensus) the committee decided upon the plan goals.

See Abstract on following page.

Abstract from page 36

***Windham, Vermont, Local Hazard Mitigation Plan (2015)***

**1. MITIGATION STRATEGY**

**A. Goals**

The Hazard Mitigation Goals as outlined below were developed by consensus among the Hazard Mitigation Planning Committee during meetings for the development of the Windham local hazard mitigation plan.

Problem Statement 1: There are a large number of undersized culverts in Windham.

Goal 1: Get all culverts up to current standards. This a joint goal between VTrans and the Town.

Problem Statement 2: Fluvial erosion is an ongoing issue in Windham.

Goal 2: Develop fluvial erosion bylaw.

General Ongoing Goals:

- Reduce the loss of life and injury resulting from all hazards.
- Reduce the impact of hazards on the town's water bodies, natural resources, and historic resources.
- Reduce the economic impacts from hazard events.
  - Minimize disruption to the road network and maintain access,
  - Mitigate financial losses incurred by municipal, residential, industrial, agricultural and commercial establishments due to disasters,
  - Ensure that community infrastructure is not significantly damaged by a hazard event.
  - Being proactive in implementing any needed mitigation projects for public infrastructure such as roads, bridges, culverts, municipal buildings, etc.
- Encourage hazard mitigation planning to be incorporated into other community planning projects, such as the Town Plan, Capital Improvement Plan, and Town Basic Emergency Operation Plan
- Ensure that members of the general public continue to be part of the hazard mitigation planning process.

## C3 Regulatory Guidance

### Abstracts from *Code of Federal Regulations and Local Mitigation Plan Review Guide, October 1, 2011*

#### Element C3 Regulation [§201.6(c) (3) (i)] (page 22)

The hazard mitigation strategy shall include a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.

#### Element Intent (page 24)

To guide the development and implementation of hazard mitigation actions for the community(ies). Goals are statements of the community's visions for the future.

#### Element Requirements (page 24)

- a. The plan **must** include general hazard mitigation goals that represent what the jurisdiction(s) seeks to accomplish through mitigation plan implementation.

**Goals** are broad policy statements that explain what is to be achieved.

- b. The goals **must** be consistent with the hazards identified in the plan.

#### Note about Updates (page 23)

In the plan update, goals and actions are either reaffirmed or updated based on current conditions, including the completion of hazard mitigation initiatives, an updated or new risk assessment, or changes in State or local priorities.

### ***Check Out These Additional Aids***

Local Mitigation Plan Review Guide, October 2011

<http://www.fema.gov/media-library/assets/documents/23194>

Local Mitigation Planning Handbook, March 2013 (page 6-2)

<http://www.fema.gov/media-library/assets/documents/31598>