



FEMA Requirement C4: Comprehensive Range of Actions & Projects

Does the Plan identify and analyze a comprehensive range of specific mitigation actions and projects for each jurisdiction being considered to reduce the hazards, with emphasis on new and existing buildings and infrastructure?

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

This “Good Practice” document is intended to help plan developers understand the FEMA requirement to identify and analyze a comprehensive range of mitigation actions and projects for the jurisdiction. This particular requirement is frequently misunderstood. A good understanding of long term risk reduction (mitigation) and an effective process helps jurisdictions weigh options for accomplishing mitigation.

Common Reasons Why FEMA Returns Plans for C4 Revisions

1. The analysis of comprehensive range of alternatives and/or projects is not explained to show that a community considered multiple options to mitigate the specific vulnerabilities/problems that it identified as most important to address in the life cycle of the plan.

Tip: Analyze and document a variety of solutions targeting each vulnerability. Some may be actions considered, but not included in the action plan for implementation. Within plans, such alternatives often are described together with an explanation how actions were prioritized to decide upon the preferred option the community intends to implement if resources become available (to meet Element C5 requirements).

Tip: Avoid generic “laundry lists” of mitigation action types in an unfocused attempt to meet a comprehensive range of alternatives. Instead concentrate on the specific vulnerabilities and problems the community identified as its highest priority in reducing hazard impacts.

Tip: Provide narrative descriptions of the actions clearly identifying problem(s) (one or more vulnerabilities) and how each action will reduce the long term risk

(e.g. the desired outcome). Follow with a table summarizing these points and implementation related to Requirement C5.

Tip: Integrate local planning efforts by incorporating mitigation actions from other community plans, which the community intends to implement. For instance, these may be actions shared with a watershed plan or a comprehensive/town/master plan. (This tip is also related to Requirement C6.)

Tip: When possible, include the next steps in implementing a specific action. Including additional detail creates a plan ready for effective implementation.

2. A new step, phase, or improvement is not identified for actions or projects already begun or in place before the planning cycle and that are carried into the current update's cycle.
3. A mitigation action and/or project is not included which the community intends to implement if the necessary resources become available.
4. The descriptions of proposed actions and projects utilize verbs such as "consider," "ensure," "encourage", "continue," "coordinate" and/or similar vague expressions. Such terms do not convey a specific intended action of the community to mitigate for a vulnerability.

Tip: Use action verbs such as "*draft* an ordinance for public consideration" rather than "*consider* an ordinance change", or "*implement* a homeowner education program providing information on defensible perimeters and other methods to protect property from wildfires" instead of "*encourage* homeowners to protect property from wildfires".
5. The actions and projects are not designed to reduce long-term risk from natural hazards which by definition is mitigation. Mitigation is not included in the plan strategy. Only maintenance, response, and/or preparedness-related actions and/or projects are analyzed, described, and designated for implementation.

The reason for this may be that non-mitigation activities are confused with mitigation strategies and actions. Most often misidentified as mitigation are: replacements and repairs without an improvement to mitigate for the long term, routine repairs and cleaning, installation of temporary structures, continuation of existing programs already in place, or actions not addressing the desired mitigation outcome. Studies do not mitigate, although later activities arising from such studies may ultimately reduce risk.

Tip: Emphasize and clearly distinguish mitigation actions as distinct from preparedness and other non-mitigation actions. This is important, so that the community fully understands the difference and focuses the plan on long term risk reduction. To check on whether an action is considered mitigation under this requirement, refer to *Mitigation Ideas: Possible Mitigation Measures by Type*, available from the FEMA Region 1 office.

Tip: Present and identify non-mitigation actions within a separate section or table of the mitigation plan. Note: Irrespective of inclusion, such items are not accepted as mitigation actions by FEMA but are understood to be important to some communities for inclusion.

Tip: If a study or engineering or other plan is part of an intended mitigation project or activity, include the full mitigation strategy within the plan, while listing the study as a phase, even if the follow-up action will occur beyond the life of the 5-year plan.

6. The analyzed actions do not mitigate natural hazards for both **existing and new building and** infrastructure. In other words, an emphasis is lacking for actions or projects reducing or eliminating risk to the existing built environment and new development/redevelopment. For instance, while the analysis might include project(s) for mitigating *existing* drainage problems, it omits any action to promote more resilient also for *new* development through revising a building code or stormwater management regulations.

Tip: Every mitigation opportunity will not result in viable options addressing both existing and new development. Look for ways to include at least one action each for new and existing development among the community's proposed activities for implementation, and/or explain the rationale for omitting one of the types.

Tip: For multi-jurisdiction plans, don't forget to analyze actions or projects for both new and existing types of development for each participating community.

Approaches Demonstrating Good Practices for Requirement C4

This section provides three examples illustrating different aspects of the requirement. Example 1 shows a worksheet method for analyzing options to mitigate a hazard risk. Example 2 demonstrates a comprehensive range of actions and projects for existing structures and new development. Example 3 is particularly noteworthy for drawing connections to specific vulnerabilities. Practices going "Beyond Minimum Requirements" are also noted.

Example 1: Hazard Mitigation Plan and Worksheet

Based on and modified from examples and worksheets originating with the Association of State Floodplain Managers

Why This Example and Worksheet Demonstrate Good Practice

1. The identified actions address a vulnerability that is specific to the community and clearly articulated in the problem statement.

2. A range of options related to the specific problem is analyzed for potential implementation, explaining why one action moved forward into the implementation program.
3. Mitigation of both existing and new development is considered in the analysis. In the example, the community decided in favor of elevating existing structures, rather than regulating new development more stringently.
4. The actions and projects are designed to reduce long-term risk from natural hazards. In other words, these activities mitigate.

See *Action Worksheet below, along with Instructions and Attachment A: FEMA R1 Mitigation Ideas* on following pages.

Action Worksheet Example	
Name of Jurisdiction:	Town of Crowdon, Aviairy County VT
Name of Haz. Mit. Plan:	Aviairy County Multi-Jurisdictional Hazard Mitigation Plan (New plan)
Risk / Vulnerability	
Problem being Mitigated:	The Crowdon River is subject to ice jams near River Road, many times flooding homes and disrupting traffic. Homeowners have incurred high rebuilding costs, over and above insurance claims. Local, state, and federal resources expended repetitively clean-up and rebuilding process.
Potential Actions/Projects (not being Implemented at this time)	
Actions/Projects Considered with Summary Evaluation of Each:	<p><u>Crowdon River Rock Removal</u> – Remove the large rocks from the river that catch ice flows. This alternative is not being pursued because the financial costs would be very high and the effectiveness of this is in doubt. It would also jeopardize the viability of the river as a fishing destination.</p> <p><u>Acquire Homes</u> – Offer to purchase the affected homes. Upon taking ownership, remove the homes and return the land to its natural state. This alternative is not being pursued because homeowners do not want to leave the community. Removal of these homes would also diminish the town’s tax base.</p> <p><u>Revise Floodplain Mgt Ordinance</u> – Prohibit development of new major structures in the Flood Hazard Zone of the Crowdon River. This option is not being pursued because few undeveloped lots are left in the village area which encompasses most of this floodplain.</p>
Action or Project Intended for Implementation	
Action/Project Number:	L-1: River Road Home Elevations Program
Name of Action or Project:	
Action or Project Description:	Offer to partially fund the elevation of homes that have been multiple times over the past thirty-years. When homeowners accept this offer, homes will be elevated above base flood evaluation and according to VTS building code.
Summary of Evaluation	Partially funding home elevations makes this option affordable to homeowners and avoids a lessening of the town’s tax base. The mitigation action would avoid future flood damage of about \$750,000. The cost of the elevation program is expected to be just under \$500,000. The program would be voluntary, making it more socially and politically acceptable.
Benefits (losses avoided)	
Estimated Cost	
Other Factors Considered	
Plan for Implementation	

Action Worksheet Example	
Responsible Organization:	Town Planning Department
Action/Project Priority:	High
Timeline for Completion:	An application for a FEMA grant will be made in year 1 and the program should be completed within 3 years.
Potential Fund Sources:	FEMA Hazard Mitigation Grant Program (HMGP) funds FEMA Pre-Disaster Mitigation Program (PDM) funds
Local Planning Mechanisms to be Used in Implementation, if any:	The administration of this activity will be added to Planning Department's annual work plan.
Progress Report	
Date of Status Report: Report of Progress: Evaluation of Effectiveness:	No report at this time.

Blank Action Worksheet	
Name of Jurisdiction: Name of Haz. Mit. Plan:	
Risk / Vulnerability	
Problem being Mitigated:	
Potential Actions/Projects (not being Implemented at this time)	
Actions/Projects Considered with Summary Evaluation of Each:	
Action or Project Intended for Implementation	
Action/Project Number: Name of Action or Project:	
Action or Project Description:	
Summary of Evaluation¹ Benefits (losses avoided) Estimated Cost Other Factors Considered	
Plan for Implementation	
Responsible Organization:	
Action/Project Priority:	
Timeline for Completion:	
Potential Fund Sources:	
Local Planning Mechanisms to be Used in Implementation, if any:	
Progress Report	

Date of Status Report: Report of Progress: Evaluation of Effectiveness:	
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Action Worksheet Instructions	
Name of Jurisdiction:	<i>Give the name of your municipality</i>
Name of Haz. Mit. Plan:	<i>Name of the Hazard Mitigation Plan when it is a Multi-Jurisdictional Plan</i>
Risk / Vulnerability	
Problem being Mitigated:	<i>Describe the specific problem or area of concern (vulnerabilities identified in the risk assessment). Each Action Worksheet should describe a unique problem. A well written problem statement is key to a successful mitigation action. The input from those previously or potentially impacted in the community are key in defining the problem(s) important to the community.</i>
Potential Actions/Projects (not being Implemented at this time)	
Actions/Projects Considered with Summary Evaluation of Each:	<i>For each problem, consider different types of mitigation actions/projects. Document this consideration by naming the potential actions/projects considered and by explaining why each is not being implemented. The documentation of alternatives encourages comprehensive thinking and facilitates the preparation of grant applications. A variety of stakeholders may yield a good range of alternatives.</i>
Action or Project Intended for Implementation	
Action/Project Number: Name of Action or Project:	<i>Give each action a unique number and name (title) for easy reference. It is recommended that the municipality's initials be part of the action number to avoid confusion in multi-jurisdiction plans. For example, the City of Long Beach might use the number LB-1 for their first action.</i>
Action or Project Description:	<i>Describe the work to be done. It should be a unique statement of work, not a generic statement. Sources, such as FEMA's Mitigation Ideas publication, include generic actions to trigger the brainstorming of specific actions that could be taken. These generic actions must be refined into specific actions that address the specific problem at hand. Identify the desired mitigated outcome.</i>
Summary of Evaluation Benefits (losses avoided) Estimated Cost Other Factors Considered	<i>Summarize the evaluation of the action/project. Part of this evaluation must be a consideration of the benefits (losses avoided) and costs for the project. Describe any other factors and how they affected the decision. Factors such as technical, legal, environmental, social, and political considerations. The capacity of the jurisdiction to undertake this work should also be considered.</i>
Plan for Implementation	
Responsible Organization:	<i>This should be the name of a department or agency, not the name of the municipality. If it is possible to identify a specific position or representative who will be responsible, this is also beneficial to include.</i>
Action/Project Priority:	<i>Actions may be numbered in priority order or could be assigned a general priority, such as high, medium, or low. For updates, identify the changes in priorities.</i>
Timeline for Completion:	<i>State the target timeframe when the action/project will be initiated/started and completed. All actions must have a point in time when they will be completed in order to be considered a mitigation action as defined by FEMA. Actions which are "ongoing" (e.g. maintenance) reduce risk for the short-term and may be very worthy activities, but they do not meet the definition of mitigation action for this plan. Mitigation action for this plan must reduce risk for the long-term.</i>
Potential Fund Sources:	<i>Multiple sources of potential funding should be listed when appropriate.</i>

<p>Local Planning Mechanisms to be Used in Implementation, if any:</p>	<p><i>Other plans (e.g. land use plans) and processes (e.g. capital budgeting process) are often means through which mitigation actions can be more easily implemented. Consider the use of local planning mechanisms and identify any existing planning mechanisms that will be used to implement this action/project. Be sure to describe how this (the process) will be integrated into any of these other planning mechanisms.</i></p>
<p>Progress Report/Updates</p>	
<p>Date of Status Report: Report of Progress: Evaluation of Effectiveness/Meeting the Mitigation Goals:</p>	<p><i>In the future this space may be used to report on progress. Leave this space blank until it is time to complete a status report. Identify the actions from the previous plan, the status (completed or if not completed then where these are located in the updated plan and which were removed, deferred, etc.), and any changes in priorities..*****</i></p>

Example 2: *Town of Pittsford, VT Local Hazard Mitigation Plan, 2016***Why This Plan Demonstrates Good Practice**

1. The proposed mitigation actions and projects specifically address an identified vulnerability expressed in a problem statement. Note: only one vulnerability is examined in this abstract.
2. A range of actions and projects is considered for this vulnerability, from site-specific projects to regulatory and public education actions and the process for analyzing the actions is explained.
3. Analyzed activities address both the new and existing built environment.
Beyond Minimum Requirements. The action plan the community intends to implement has actions and projects designed to mitigate risks for both existing structures and new development.
4. The mitigation actions and projects analyzed and designated for implementation are designed to reduce long-term risk from natural hazards. The preparedness action at the end is clearly understood to be different from mitigation.

See Abstract on following pages.

Abstract from pages 28-29

Town of Pittsford, VT Local Hazard Mitigation Plan (2016)

6.5 Mitigation Actions and Projects

The town’s hazard mitigation committee reviewed past projects and considered new mitigation actions in creating a new mitigation strategy: reviewing projects from

1. **Prevention:** Land use bylaws, open space preservation, building codes, etc.
2. **Property Protection:** Acquisition, relocation, elevation, flood-proofing, etc.
3. **Public Education & Awareness:** Website with maps, public outreach programs, real estate disclosures, etc.
4. **Natural Resource Protection:** Green storm water infrastructure, low impact development bylaws, protection of steep slopes, etc.
5. **Emergency Services Protection:** Protect critical facilities, warning capabilities, and infrastructure; generators for critical facilities; etc.

the last plan and considering new actions for the town to pursue from the following categories:

6. **Structural Projects:** Culvert upsizing, bridge upsizing, floodplain restoration, etc.

Each potential project was considered regarding the benefits it would provide to the town, and the costs required for implementation. A Benefit-Cost Score which is included in the “Table of the Benefit Cost Analysis for the Mitigation Actions”, with the highest scores indicating the most benefit and least cost. Mitigation actions and projects proposed in this plan should undergo more rigorous benefit-cost analysis by the town before action is taken.

Worksheet for Calculating Each Mitigation Action’s Benefit Cost Analysis

<p>Benefit. Benefits include protection of life and property, increase in public safety, damage reduction and / or prevention. 3 = Fulfills all benefits listed above. 2 = Mostly fulfills benefits listed above. 1 = Fulfills only 1 or 2 benefits listed above.</p>	<p>Cost. 3 = Less than \$25,000. 2 = \$25,000 - \$100,000. 1= Over \$100,000</p>	<p>Implementation. Consider the technical feasibility as well as the political/social acceptance of the project. 3 = 6 months or less. 2 = 6 months to 1 year. 1 = Over 1 year</p>
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The following mitigation actions and projects are future mitigation strategies identified for the community. Note that the municipality will make every effort to maximize use of future Public Assistance Section 406 Mitigation opportunities when

available during federally declared disasters.

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Abstract from pages 28-29

Town of Pittsford, VT Local Hazard Mitigation Plan (2016)

Continued:

Mitigation Actions and Projects

Vulnerability: Flooding of Bridges and Low Lying Areas

Flooding of the town’s rivers, especially the Otter Creek, can cut off access to Elm Street, West Creek Road, and the Cooley and Gorham bridges. This is not only a problem for residents who wish to access their home or who wish to flee the area in a major storm, but it also causes problems for emergency vehicles that need to gain access.

Priority	Mitigation Action	Local Leadership	Funding Resources	Target Start/ Target End
High	Culvert Upsizing on Fire Hill Rd and Chittenden Rd. The current culverts are not large enough to handle storm flows, and will be replaced with box culverts, which will significantly increase the culvert’s ability to handle storm flows and decrease the likelihood of blockage from debris, resulting in a more resilient infrastructure, thereby improving long-term flood resilience.	Select Board. Highway Foreman	VTrans Structures Grant	May 2016-September 2016
High	Culvert Upsizing on Fire Hill Road and Chittenden Road. Many culverts will need to be replaced with box culverts. Box culverts will again increase flows and increase resiliency, as mentioned above.	Select Board. Highway Foreman	VTrans. HMGP	May 2017-September 2017
High	Culvert Upsizing/ Replacement. There are 15 culverts in Pittsford, in addition to the ones mentioned above, that are graded as “poor” and need to be replaced. These upgrades will again increase flows and increase resiliency, as mentioned above	Select Board. Highway Foreman	VTrans. HMGP	May 2018-September 2020
Moderate	Replace the bridge in the town’s recreation area. The footings and abutments of the bridge are too close together, and therefore the bridge constricts the flow of water in Sugar Hollow Brook. This constriction speeds up the flow of the water and causes erosion. Replacing the bridge with one that has wider footings will increase flows, reduce erosion, and overall increase the resiliency of the structure and the river ecosystem.	Select Board	HMGP	June 2019 – September 2019
Moderate	Plantings along the Sugar Hollow Brook, to lessen the impact of the erosion caused by the narrow bridge (discussed above)	Select Board, Town Manager	HMGP	June 2019 – September 2019
Moderate	Revise Zoning to require that new development be built to BFE+ 2’.	Planning Commission, Select Board	MPG	September 2016-March 2018
Moderate	Revise Zoning to Ensure New Development will not be Vulnerable to Flooding or Erosion. This includes adopting State River Corridor Protection Language	Planning Commission, Select Board.	MPG	September 2016-March 2018

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Abstract from pages 28-29

Town of Pittsford, VT Local Hazard Mitigation Plan (2016)

Continued:

Town of Pittsford Local Hazard Mitigation Plan

Elevate Elm Street and Gorham Covered Bridge	HMGP, VTRANS
(Preparedness Action) Conduct exercises with First Responders to ensure that emergency vehicles will be placed within areas that may be cut off from vehicle access during a large rain/flood event.	Fire /Police/EMS Department, EMD,

Example 3: A Single-Jurisdiction Hazard Mitigation Plan

Why This Plan Demonstrates Good Practice

1. The range of proposed mitigation actions and projects specifically addresses the most important vulnerabilities as determined by the jurisdiction.
2. The strategy has actions and projects designed to mitigate risks for both existing structures and new development.
3. The mitigation actions and projects are designed to reduce long-term risk from natural hazards. Non-mitigation items (preparedness, response, maintenance) are clearly understood and distinguished from mitigation strategies within the table (third column).

See Abstract on following pages.

Example 2: A Single-Jurisdiction Hazard Mitigation Plan Continuing and New Strategies Prioritized, 2016-2021									
Current Status	Action Name	Action Type	Description & Vulnerability	Hazards Mitigated	Responsible Party	Project Priority	Cost/Benefit	Funding Source	Time-frame (within 5-year plan)
New strategy (Waiting for contract from FEMA)	Drainage improvement - Pheasant Lane	Mitigation, Capital construction	Install rock liner and water bars in a 1.5 mile stretch of drainage on Pheasant Lane and Main Street to reduce vulnerability to fluvial erosion.	Flooding, tropical storm, thunderstorm, winter storm	Board of Selectmen, DPW, EMD	High	\$938,000	HMGP (applied), town fund match	Year 2 to Year 3
Identified in previous plan (Town has applied for and received HMPG grant and is awaiting receipt of funds.)	Improvement of culverts - Woodland Street	Mitigation, Capital construction	Install larger culverts at three locations, installing trash racks, walls and bank stabilization to ensure access to town shelter is maintained when activated.	Flooding, tropical storm, thunderstorm, winter storm	Board of Selectmen, EMD, DPW	High	\$386,000	HMGP (secured), town fund match	Year 2 to Year 3
New strategy	Improvement of culverts - Prospect Hill	Mitigation, Capital construction	Upgrade drainage and stabilize flood control bank at Prospect Hill	Flooding, tropical storm, thunderstorm, winter storm	Board of Selectmen, DPW, EMD	High	High	HMGP, town fund match	Year 2 to Year 3
New strategy	Clear waterways	Response, Capital construction	Clear debris out of waterways after storms	(Response and maintenance action)	Board of Selectmen, DPW, EMD	Medium	Med	DPW	Year 1 to Year 5
New strategy	Detention basin Improvement - Dove Drive	Mitigation, Capital construction	Upgrade detention basin at Dove Drive and Mary Drive to reduce vulnerability during rapid high precipitation events	Flooding, tropical storm, thunderstorm, winter storm	Board of Selectmen, DPW, EMD	High	High	HMGP, town fund match	Year 2 to Year 3
Identified in previous plan. (Town is determining locations for racks; will install as resources are available.)	Trash racks on culverts	Mitigation, Operational strategy	Install trash racks over various existing culverts to prevent blockages and road closings	Flooding, hurricane, thunderstorm, winter storm	Board of Selectmen, DPW, EMD	High	Low	DPW	Year 1 to Year 5

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Example 2: A Single-Jurisdiction Hazard Mitigation Plan Continuing and New Strategies Prioritized, 2016-2021 (Continued)									
Current Status	Action Name	Action Type	Description & Vulnerability	Hazards Mitigated	Responsible Party	Project Priority	Cost/Benefit	Funding Source	Time-frame (within 5-year plan)
Identified in previous plan. (Impact study has not been completed.)	Impact studies for high-hazard dams	Preparedness, Planning document	Conduct impact studies for high-hazard dams to mitigate the impact of dam breaches	(Preparedness Action)	EMD	High	Low	HMGP, town fund match	Year 1 to Year 5
Identified in previous plan. (Fire Dept to add additional educational programs)	Public education / fire outreach on defensible parameters	Mitigation, Operational strategy, Public Education	Educate residents on fire defensible parameters through distributed literature and local access cable TV	Drought, Wildfire / Brushfire	Fire Dept.	Low	Low	Fire Dept.	Year 1 to Year 5
Identified in previous plan. (Town has not made progress because of cost relative to priority)	Water tower seismic improvements	Mitigation, Capital construction	Make seismic improvements to 2-million-gallon water tower to prevent tower rupture and prolonged loss of service	Earthquake	DPW, Building Inspector	Low	High	HMGP, town fund match	Year 2 to Year 5
New strategy	Fluvial Areas Development Standards	Mitigation	Recommend changes for zoning and development standards to implement Fluvial Erosion Study findings	Flooding, tropical storm, thunderstorm, winter storm	Planning Board	High	Low	Town funds	Year 1 to Year 3
New strategy	Emergency backup generator	Preparedness, Mitigation (infrastructure redundancy), Operational Strategy	Install emergency backup generator at Department of Public Works facility to maintain response capabilities during an event	Wind, ice storm	Board of Selectmen, DPW, EMD	High	\$123,500	HMGP (secured) town fund match	0 to Year 1

C4 Regulatory Guidance

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

Element C4 Regulation [§201.6(c)(3)(ii) and (iv)] (page 22)

[The hazard mitigation strategy shall include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.

For multi-jurisdictional plans, there must be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.

Element Intent (page 24)

To ensure the hazard mitigation actions are based on the identified hazard vulnerabilities, are within the capability of each jurisdiction, and reduce or avoid future losses. This is the heart of the mitigation plan, and is essential to leading communities to reduce their risk. Communities, not FEMA, “own” the hazard mitigation actions in the strategy.

Element Requirements (page 24)

- a. The plan **must** include a mitigation strategy that:
 1. analyzes actions and/or projects that the jurisdiction considered to reduce the impacts of hazards identified in the risk assessment, and
 2. identifies the actions and/or projects that the jurisdiction intends to implement.

Mitigation actions and projects means a hazard mitigation action, activity or process (for example, adopting a building code) or it can be a physical project (for example, elevating structures or retrofitting critical infrastructure) designed to reduce or eliminate the long term risks from hazards. This sub-element can be met with either actions or projects, or a combination of actions and projects.

The mitigation plan may include non-mitigation actions, such as actions that are emergency response or operational preparedness in nature. These will not be accepted as hazard mitigation actions, but neither will FEMA require these to be removed from the plan prior to approval.

A **comprehensive range** consists of different hazard mitigation alternatives that address the vulnerabilities to the hazards that the jurisdiction(s) determine are most important.

- b. Each jurisdiction participating in the plan **must** have mitigation actions specific to that jurisdiction that are based on the community’s risk and vulnerabilities, as well as community priorities.
- c. The action plan **must** reduce risk to existing buildings and infrastructure as well as limit any risk to new development and redevelopment. **With emphasis on new and existing building and infrastructure** means that the action plan includes a consideration of actions that address the built environment.

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 (pages 6-3 through 6-6)

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