

## Columbia County, NY – FEMA Mitigation Plan Review Tool

### Summary:

The plan is Approvable Pending Adoption, and the Town of Taghkanic and the Village of Philmont have met the HHPD requirements, making the high hazard dams located in those jurisdictions eligible for HHPD grants.

Each jurisdiction should formally adopt the plan as soon as practical.

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Plan Information	
<b>Jurisdiction(s)</b>	Columbia County, New York and 23 of its local jurisdictions.
<b>Title of Plan</b>	Columbia County Multi-Jurisdiction Natural Hazard Mitigation Plan.
<b>New Plan or Update</b>	Update
<b>Single- or Multi-Jurisdiction</b>	Multi Jurisdiction.
<b>Date of Plan</b>	8/15/25
Local Point of Contact	
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<b>Review Information</b>	
<b>State Review</b>	
<b>State Reviewer(s) and Title</b>	Betsy Parmerter, DHSES Hazard Mitigation Contractor Michael Tarasoff, Hazard Mitigation Planner Scott Feuerstein, Hazard Mitigation Planner
<b>State Review Date</b>	8/19/2025
<b>FEMA Review</b>	
<b>FEMA Reviewer(s) and Title</b>	Paul Hoole, Emergency Manager (Mitigation)
<b>Date Received in FEMA Region</b>	8/19/2025
<b>Plan Not Approved</b>	Click or tap to enter a date.
<b>Plan Approvable Pending Adoption</b>	8/26/2025
<b>Plan Approved</b>	Click or tap to enter a date.

## Multi-Jurisdictional Summary Sheet

#	Jurisdiction Name	Requirements Met (Y/N)							
		A. Planning Process	B. Risk Assessment	C. Mitigation Strategy	D. Plan Maintenance	E. Plan Update	F. Plan Adoption	G. HHPD Requirements	H. State Requirements
1	City of Hudson	Y	Y	Y	Y	Y	N	na	NA
2	Town of Ancram	Y	Y	Y	Y	Y	N	na	na
3	Town of Austerlitz	Y	Y	Y	Y	Y	N	na	na
4	Town of Canaan	Y	Y	Y	Y	Y	N	na	na
5	Town of Chatham	Y	Y	Y	Y	Y	N	na	na
6	Town of Claverack	Y	Y	Y	Y	Y	N	na	NA
7	Town of Clermont	Y	Y	Y	Y	Y	N	na	NA
8	Town of Copake	Y	Y	Y	Y	Y	N	na	NA
9	Town of Gallatin	Y	Y	Y	Y	Y	N	na	NA
10	Town of Germantown	Y	Y	Y	Y	Y	N	na	NA
11	Town of Ghent	Y	Y	Y	Y	Y	N	na	NA
12	Town of Greenport	Y	Y	Y	Y	Y	N	na	NA
13	Town of Hillsdale	Y	Y	Y	Y	Y	N	na	NA
14	Town of Kinderhook	Y	Y	Y	Y	Y	N	na	NA
15	Town of Livingston	Y	Y	Y	Y	Y	N	na	NA
16	Town of New Lebanon	Y	Y	Y	Y	Y	N	na	NA
17	Town of Stockport	Y	Y	Y	Y	Y	N	na	NA
18	Town of Stuyvesant	Y	Y	Y	Y	Y	N	na	NA
19	Town of Taghkanic	Y	Y	Y	Y	Y	N	Y	NA
20	Village of Chatham	Y	Y	Y	Y	Y	N	na	NA

#	Jurisdiction Name	Requirements Met (Y/N)							
		A. Planning Process	B. Risk Assessment	C. Mitigation Strategy	D. Plan Maintenance	E. Plan Update	F. Plan Adoption	G. HHPD Requirements	H. State Requirements
21	Village of Kinderhook	Y	Y	Y	Y	Y	N	na	NA
22	Village of Philmont	Y	Y	Y	Y	Y	N	Y	NA
23	Village of Valatie	Y	Y	Y	Y	Y	N	na	NA
24	Columbia County	Y	Y	Y	Y	Y	N	na	NA

## Plan Review Checklist

The Plan Review Checklist is completed by FEMA. States and local governments are encouraged, but not required, to use the PRT as a checklist to ensure all requirements have been met prior to submitting the plan for review and approval. 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.” FEMA completes the “required revisions” summary at the bottom of each element to clearly explain the revisions that are required for plan approval. Required revisions must be explained for each plan sub-element that is “not met.” Sub-elements in each summary should be referenced using the appropriate numbers (A1, B3, etc.), where applicable. Requirements for each element and sub-element are described in detail in Section 4: Local Plan Requirements of this guide.

Plan updates must include information from the current planning process.

If some elements of the plan do not require an update, due to minimal or no changes between updates, the plan must document the reasons for that.

Multi-jurisdictional elements must cover information unique to all participating jurisdictions.

### Element A: Planning Process

Element A Requirements	Location in Plan (section and/or page number)	Met / Not Met
<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 44 CFR § 201.6(c)(1))</b>		
A1-a. Does the plan document how the plan was prepared, including the schedule or time frame and activities that made up the plan’s development, as well as who was involved?	Section 1.1 page 1-1 Section 2.1 Page 2-2	Met
A1-b. Does the plan list the jurisdiction(s) participating in the plan that seek approval, and describe how they participated in the planning process?	Section 2.1, 2.3 and Table 2.3 pages 2-1 to 2-9	Met
<b>A2. Does the plan document an opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development as well as businesses, academia, and other private and non-profit interests to be involved in the planning process? (Requirement 44 CFR § 201.6(b)(2))</b>		
A2-a. Does the plan identify all stakeholders involved or given an opportunity to be involved in the planning process, and how each stakeholder was presented with this opportunity?	Section 2.4.1 and Table 2.4, page 2-7 and Appendix B.	Met

Element A Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>A3. Does the plan document how the public was involved in the planning process during the drafting stage and prior to plan approval? (Requirement 44 CFR § 201.6(b)(1))</b>		
A3-a. Does the plan document how the public was given the opportunity to be involved in the planning process and how their feedback was included in the plan?	Section 2.4.2 page 2-8 and Table 2.5 page 2-8	Met
<b>A4. Does the plan describe the review and incorporation of existing plans, studies, reports, and technical information? (Requirement 44 CFR § 201.6(b)(3))</b>		
A4-a. Does the plan document what existing plans, studies, reports and technical information were reviewed for the development of the plan, as well as how they were incorporated into the document?	Section 1.3 Appendix A, Bibliography and Section 7.2 page 7.2	Met
<b>ELEMENT A REQUIRED REVISIONS</b>		
<p><b>Required Revision:</b></p> <p>Click or tap here to enter text.</p>		

## Element B: Risk Assessment

Element B Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>B1. Does the plan include a description of the type, location, and extent of all natural hazards that can affect the jurisdiction? Does the plan also include information on previous occurrences of hazard events and on the probability of future hazard events? (Requirement 44 CFR § 201.6(c)(2)(i))</b>		
B1-a. Does the plan describe all natural hazards that can affect the jurisdiction(s) in the planning area, and does it provide the rationale if omitting any natural hazards that are commonly recognized to affect the jurisdiction(s) in the planning area?	Section 4.1.2 and Table 4-1 page 4-2	Met
B1-b. Does the plan include information on the location of each identified hazard?	See Section 4.2 starting on Page 4-6 to page 4-63	Met
B1-c. Does the plan describe the extent for each identified hazard?	See Section 4.2 starting on Page 4-6 to page 4-63	Met

Element B Requirements	Location in Plan (section and/or page number)	Met / Not Met
B1-d. Does the plan include the history of previous hazard events for each identified hazard?	See Section 4.2 starting on Page 4-6 to page 4-63	Met
B1-e. Does the plan include the probability of future events for each identified hazard, including the type, location and range of anticipated intensities?	See Section 4.2 starting on Page 4-6 to page 4-63	Met
B1-f. For participating jurisdictions in a multi-jurisdictional plan, does the plan describe any hazards that are unique to and/or vary from those affecting the overall planning area?	For Each Annex see Section 2.1 Natural Hazard Events History Specific to the Municipality	Met
<b>B2. Does the plan include a summary of the jurisdiction’s vulnerability and the impacts on the community from the identified hazards? Does this summary also address NFIP- insured structures that have been repetitively damaged by floods? (Requirement 44 CFR § 201.6(c)(2)(ii))</b>		
B2-a. Does the plan provide an overall summary of each jurisdiction’s vulnerability to the identified hazards?	For each Annex see Section 2 Natural Hazard Risk and Vulnerability Assessment	Met
B2-b. For each participating jurisdiction, does the plan describe the potential impacts of each of the identified hazards on each participating jurisdiction?	For each Annex see Section 2.5 Vulnerability Asset: Exposure Analysis	Met

Element B Requirements	Location in Plan (section and/or page number)	Met / Not Met
<p>B2-c. Does the plan address NFIP-insured structures within each jurisdiction that have been repetitively damaged by floods?</p>	<p>See Section 4.2.1 on page 4-5 and Section 7.5.1 on page 7-19. For each annex see Section 2.4 Repetitive Loss and Severe Repetitive Loss Properties, and Section 4.2 NFIP participation and Compliance Table 7 and 4.2.1 Improvement Opportunities</p>	<p>Met</p>
<p><b>ELEMENT B REQUIRED REVISIONS</b></p>		
<p><b>Required Revision:</b> Click or tap here to enter text.</p>		

### Element C: Mitigation Strategy

Element C Requirements	Location in Plan (section and/or page number)	Met / Not Met
<p><b>C1. Does the plan document each participant’s existing authorities, policies, programs and resources and its ability to expand on and improve these existing policies and programs? (Requirement 44 CFR § 201.6(c)(3))</b></p>		
<p>C1-a. Does the plan describe how the existing capabilities of each participant are available to support the mitigation strategy? Does this include a discussion of the existing building codes and land use and development ordinances or regulations?</p>	<p>Section 7 in its entirety,  For each annex, this information is included in Section 4 Capabilities</p>	<p>Met</p>

Element C Requirements	Location in Plan (section and/or page number)	Met / Not Met
C1-b. Does the plan describe each participant's ability to expand and improve the identified capabilities to achieve mitigation?	For each annex, this information is included in Section 4 Capabilities.	Met
<b>C2. Does the plan address each jurisdiction's participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement 44 CFR § 201.6(c)(3)(ii))</b>		
C2-a. Does the plan contain a narrative description or a table/list of their participation activities?	Section 7.5.1 Page 7-19 and Table 7-3 on Page 7-21 Section 8.6 page 8-12	Met
<b>C3. Does the plan include goals to reduce/avoid long-term vulnerabilities to the identified hazards? (Requirement 44 CFR § 201.6(c)(3)(i))</b>		
C3-a. Does the plan include goals to reduce the risk from the hazards identified in the plan?	See Section 8.2 Page 8-3 to 8.12	Met
<b>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 44 CFR § 201.6(c)(3)(ii))</b>		
C4-a. Does the plan include an analysis of a comprehensive range of actions/projects that each jurisdiction considered to reduce the impacts of hazards identified in the risk assessment?	See Section 8.2 Page 8-3 to 8.12	Met
C4-b. Does the plan include one or more action(s) per jurisdiction for each of the hazards as identified within the plan's risk assessment?	For each annex, this information is included in Section 5 Mitigation Strategy	Met
<b>C5. Does the plan contain an action plan that describes how the actions identified will be prioritized (including a cost-benefit review), implemented, and administered by each jurisdiction? (Requirement 44 CFR § 201.6(c)(3)(iv)); (Requirement §201.6(c)(3)(iii))</b>		
C5-a. Does the plan describe the criteria used for prioritizing actions?	See Section 8.4.1 Page 8-9 to 8.10	Met
C5-b. Does the plan provide the position, office, department or agency responsible for implementing/administrating the identified mitigation actions, as well as potential funding sources and expected time frame?	See Table 8.3 Page 8-12 to 8-17. Also, for each Annex, See Table 11 Updated Mitigation Actions	Met

Element C Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>ELEMENT C REQUIRED REVISIONS</b>		
<b>Required Revision:</b> Click or tap here to enter text.		

## Element D: Plan Maintenance

Element D Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>D1. Is there discussion of how each community will continue public participation in the plan maintenance process? (Requirement 44 CFR § 201.6(c)(4)(iii))</b>		
D1-a. Does the plan describe how communities will continue to seek future public participation after the plan has been approved?	See Section 2.4.3 and Section 9.6	Met
<b>D2. Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a five-year cycle)? (Requirement 44 CFR § 201.6(c)(4)(i))</b>		
D2-a. Does the plan describe the process that will be followed to track the progress/status of the mitigation actions identified within the Mitigation Strategy, along with when this process will occur and who will be responsible for the process?	See Section 9.2.1	Met
D2-b. Does the plan describe the process that will be followed to evaluate the plan for effectiveness? This process must identify the criteria that will be used to evaluate the information in the plan, along with when this process will occur and who will be responsible.	See Section 9.2.2	Met
D2-c. Does the plan describe the process that will be followed to update the plan, along with when this process will occur and who will be responsible for the process?	See Section 9.2.3.	Met
<b>D3. Does the plan describe a process by which each community will integrate the requirements of the mitigation plan into other planning mechanisms, such as comprehensive or capital improvement plans, when appropriate? (Requirement 44 CFR § 201.6(c)(4)(ii))</b>		
D3-a. Does the plan describe the process the community will follow to integrate the ideas, information and strategy of the mitigation plan into other planning mechanisms?	See Section 1.4 and Section 9.4	Met

Element D Requirements	Location in Plan (section and/or page number)	Met / Not Met
D3-b. Does the plan identify the planning mechanisms for each plan participant into which the ideas, information and strategy from the mitigation plan may be integrated?	See Section 9.5, Section 7.and for each annex plan see Section 5	Met
D3-c. For multi-jurisdictional plans, does the plan describe each participant's individual process for integrating information from the mitigation strategy into their identified planning mechanisms?	See Section 5 for each annex plan	Met
<b>ELEMENT D REQUIRED REVISIONS</b>		
<p><b>Required Revision:</b> Click or tap here to enter text.</p>		

## Element E: Plan Update

Element E Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>E1. Was the plan revised to reflect changes in development? (Requirement 44 CFR § 201.6(d)(3))</b>		
E1-a. Does the plan describe the changes in development that have occurred in hazard-prone areas that have increased or decreased each community’s vulnerability since the previous plan was approved?	Section 5.1 on page 5-2 including Land use trends and Anticipated Future Development. Including Table 5-2 Areas slated for development within 10 years	Met
<b>E2. Was the plan revised to reflect changes in priorities and progress in local mitigation efforts? (Requirement 44 CFR § 201.6(d)(3))</b>		
E2-a. Does the plan describe how it was revised due to changes in community priorities?	Section 8.7 Page 8-12	Met
E2-b. Does the plan include a status update for all mitigation actions identified in the previous mitigation plan?	Section 8 Page 8-4 and Table 8.1 on Page 8-5	Met

Element E Requirements	Location in Plan (section and/or page number)	Met / Not Met
E2-c. Does the plan describe how jurisdictions integrated the mitigation plan, when appropriate, into other planning mechanisms?	For each Annex see Section 5	Met
<b>ELEMENT E REQUIRED REVISIONS</b>		
<p><b>Required Revision:</b> Click or tap here to enter text.</p>		

## Element F: Plan Adoption

Element F Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>F1. For single-jurisdictional plans, has the governing body of the jurisdiction formally adopted the plan to be eligible for certain FEMA assistance? (Requirement 44 CFR § 201.6(c)(5))</b>		
F1-a. Does the participant include documentation of adoption?	Click or tap here to enter text.	Choose an item.
<b>F2. For multi-jurisdictional plans, has the governing body of each jurisdiction officially adopted the plan to be eligible for certain FEMA assistance? (Requirement 44 CFR § 201.6(c)(5))</b>		
F2-a. Did each participant adopt the plan and provide documentation of that adoption?	See Section 10.3. Will be included in front of plan.	Not Met
<b>ELEMENT F REQUIRED REVISIONS</b>		
<p><b>Required Revision:</b></p> <p>Each jurisdiction should adopt the plan and submit a certified copy of an adoption resolution to FEMA through DHSES as soon as practical.</p>		

## Element G: High Hazard Potential Dams (Optional)

<b>HHPD Requirements</b> <b>For the Town of Taghkanic [Churchtown Dam], and</b> <b>For the Village of Philmont [Summit Street Lake Dam]are .</b>	<b>Location in Plan</b> <b>(section and/or page</b> <b>number)</b>	<b>Met /</b> <b>Not Met</b>
<b>HHPD1. Did the plan describe the incorporation of existing plans, studies, reports and technical information for HHPDs?</b>		
HHPD1-a. Does the plan describe how the local government worked with local dam owners and/or the state dam safety agency?	Appendix F	Met
HHPD1-b. Does the plan incorporate information shared by the state and/or local dam owners?	Appendix F	Met
<b>HHPD2. Did the plan address HHPDs in the risk assessment?</b>		
HHPD2-a. Does the plan describe the risks and vulnerabilities to and from HHPDs?	Section 4.2.5	Met
HHPD2-b. Does the plan document the limitations and describe how to address deficiencies?	Section 4.2.5 Table 4-8 and Appendix F	Met
<b>HHPD3. Did the plan include mitigation goals to reduce long-term vulnerabilities from HHPDs?</b>		
HHPD3-a. Does the plan address how to reduce vulnerabilities to and from HHPDs as part of its own goals or with other long-term strategies?	Section 8.1.1.	Met
HHPD3-b. Does the plan link proposed actions to reducing long-term vulnerabilities that are consistent with its goals?	Philmont and Hudson Annex Mitigation Actions	Met
<b>HHPD4-a. Did the plan include actions that address HHPDs and prioritize mitigation actions to reduce vulnerabilities from HHPDs?</b>		
HHPD4-a. Does the plan describe specific actions to address HHPDs?	Philmont and Hudson Annex Mitigation Actions	Met
HHPD4-b. Does the plan describe the criteria used to prioritize actions related to HHPDs?	Section 8-4.1 Page 8-9	Met
HHPD4-c. Does the plan identify the position, office, department or agency responsible for implementing and administering the action to mitigate hazards to or from HHPDs?	Appendix F	Met

HHPD Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>For the Town of Taghkanic [Churchtown Dam], and For the Village of Philmont [Summit Street Lake Dam]are .</b>		
<b>HHPD Required Revisions</b>		
<b>Required Revision:</b> Click or tap here to enter text.		

## Element H: Additional State Requirements (Optional)

Not reviewed by FEMA

Element H Requirements	Location in Plan (section and/or page number)	Met / Not Met
<b>H1. Do jurisdictions identify critical facilities, assess vulnerabilities and ensure protection to a 0.02% chance event or worst-case scenario?</b>		
H1-a. Does the plan document the name of facility, type of facility, jurisdictional location, and exposure to a 1% (100-year) and 0.2% chance event?	Yes, see Section 2.3 in each annex Table 3 and Section 3 Problem statements for discussion on vulnerable community assets	Met
H1-b. Does the plan document those critical facilities are protected to a 0.2% flood event, or previous worst case flood event?	Yes, see Section 2.3 in each annex Table 3 and Section 3 Problem statements for discussion on vulnerable community assets	Met

Element H Requirements	Location in Plan (section and/or page number)	Met / Not Met
H1-c. For those that do not meet this level of protection (0.2%), the plan must include an action to meet or go beyond this criterion or explain why it is not feasible to do so.	Yes, see Section 2.3 in each annex Table 3 and Section 3 Problem statements for discussion on vulnerable community assets	Met
<b>H2. Does the plan include an annex for every jurisdiction within the County’s boundaries, including the County?</b>		
H2-a. Is there an annex for each jurisdiction seeking FEMA approval within County’s boundaries, including the County?	Yes	Met
H2-b. Does the plan include a table in the introduction section clearly identifying all jurisdictions which are seeking FEMA approval?	Yes.	Met
<b>H3. Within each jurisdictional annex, are projects developed in accordance with the NYS DHSES Proposed Projects Table?</b>		
H3-a. Does the plan include a minimum of two (2) new or carryover (not started) proposed mitigation actions that include all information requested in the NYS DHSES LHMP Proposed Action spreadsheet?	Yes, See Section 5 in each annex	Met
H3-b. For jurisdictions containing an SFHA, one (1) of these actions must be for a project that addresses flooding.	Yes, See Section 5 in each annex	Met
<b>H4. Was the draft plan posted for public comment?</b>		
H4-a. Was the draft plan posted in full (except for discretionary sensitive information) for 30 days for public comment or the time prescribed by local law, whichever is greater.	The plan will be posted for public comments in March 2025	Met

Element H Requirements	Location in Plan (section and/or page number)	Met / Not Met
H4-b. Is a description included of the efforts to gain feedback from underserved areas where residents may not have computer or internet access?	Section 2.4.1 , 2.4.2 Stakeholder Outreach and Appendix B Guidance Document	Met
H4-c. Does the website clearly identify how the public can comment on the plan and include either specific contact information to send comments or a user-friendly form or survey?	Yes, Website will include specific contact information See Appendix B Public Outreach – Public Notices	Met
<b>Element H Required Revisions</b>		
<p><b>Required Revision:</b> Click or tap here to enter text.</p>		

## Plan Assessment

These comments can be used to help guide your annual/regularly scheduled updates and the next plan update. **FEMA comments are those with a maroon font.**

### Element A. Planning Process

#### Strengths

- Page 24 of the HMP reports 350 county residents responded to the HMP survey, which is a fairly good response rate.
- **Appendix B documents an impressive list of stakeholders who were reached out to during the planning process, and a variety of ways to connect with people and organizations.**

#### Opportunities for Improvement

- A2-a: HMP page 22 presents a table that includes a column that reports the method used to contact potential agency stakeholders invited to participate in the HMP update process. The HMP table can be improved if the date of the outreach were also reported as well as the name of a contact person, the date the invitation was sent, and whether the invited person responded to the email invitation and actually participated in the HMP process.
- A3-a: HMP page 24 reports HMP survey responses were not received from 3 jurisdictions. The HMP can be improved if follow up outreach occurred to ensure participation from all participating jurisdictions.
- A4-a: Each annex includes a map that shows the 100 and 500 year annual flood risk. The legends need to report the source of flood data, which is currently missing from the map legends. Ideally, the FIRM panel numbers shown in each flood map also need to be reported.
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### Element B. Risk Assessment

#### Strengths

- B1-a/B1-b/B2-a: Each annex has a complete and lengthy list of community assets.
- B2-a: Each annex has formatted an excellent series of problem and solution statements.
- **The plan in Section 4.1.2 clearly explained why the list of hazards of concern in the county was reduced to three hazards, and in a few words explained what the hazards covered. The language was clear and concise.**
- **Table 4-5, Locally Identified Areas of Flooding in Columbia County, was a succinct way of presenting information on flooding by the source of the flooding, and where appropriate multiple jurisdictions were named as being affected. This is a second example of a clear and concise presentation of information.**
- **The plan's interactive dashboard, available by clicking a link (page 5-3) is an excellent feature build into the plan, where readers can learn more about specific assets.**

## Opportunities for Improvement

- B1-a: HMP page 39 reports hazards of concerns at a county-wide level. The HMP can be improved if a statement was added that clarifies if participating jurisdictions also acknowledge the same hazards of concern as the County. For example:
  - Three jurisdictions have HHPDs (City of Hudson, Village of Philmont, and the Town of Taghkanic) and two jurisdictions (Germantown and Stockport) have concerns about dam safety. However, none of the annexes report if dam failure is a hazard of concern even though mitigation actions are proposed to address dam safety. The HMP and annexes can be improved if they added a statement or phrase to clarify if dam failure is a hazard of concern.
    - FEMA position is that dams are critical facilities and should not be identified as a hazard of concern. As a critical facility they subject to the potential impacts from natural hazards, and the potential cascading impacts from a dam failure should be thought of as a flood and mitigated accordingly. The loss of the pooled reservoir might also be significant (e.g., loss of portable water) and deserving of mitigating actions.
  - The Town of Hillsdale reports it is unprepared to address wildfires and includes a mitigation action in their 2025 spreadsheet to address local concerns regarding wildfires. The annex, however, does not report wildfires as a hazard of concern. The Town of Hillsdale annex can be improved if they stated whether wildfires are a hazard of concern to their community.
- B1-b: Each annex of the HMP includes digitized flood maps. Although the legend of the flood maps cite the year the maps were created, the legends do not report the year of the FIRM data represented in the maps and whether the maps represent the jurisdictions' regulatory FIRMs. This information needs to be added to all GIS maps that shows flood zones.
- B1-d/B1-a: The HMP is required to list state and federally declared emergencies that have impacted the planning area since the last HMP. The Columbia County 2025 HMP draft does not include the state and nationally declared COVID emergency. The COVID emergency needs to be added to HMP Table 1-1. If disease outbreak and COVID are not a hazard of concern, the HMP needs to explain the rationale for its omission, as required by the 2025 FEMA Local Mitigation Planning Policy Guide states, "At a minimum, this, (list of previous hazard events), includes any state and federal major disaster declarations for the planning area since the last update."
- B2-c: The HMP reports the numbers and damages for RL and SRL sites that have NFIP insurance. The HMP can be improved if each annex reported flooding issues pertinent to all sites that repetitively flood, even sites that lack flood insurance.
- Section 4.2.2, Ice Jams, provides a good overview of this hazard, but the overview is for New York State and does not apply to Columbia County. This is an example of where information could be omitted from the plan. The plan would be improved if the information presented was limited to information relevant to the planning area.
- Consider adding to the list of Critical Facilities the two Class C, high hazards dams, especially the Summit Street Lake Dam which is describe by the NYSDEC dam inventory as a source of portable water.

## Element C. Mitigation Strategy

### Strengths

- The introduction for Section 7, *Capability Assessment Overview*, is well written. It clearly states that “As in any planning process, it is important to establish which activities are feasible based on the organizational capacity of agencies and departments tasked with their implementation.”

### Opportunities for Improvement

- C1-b: All annexes propose strategies and actions to improve their jurisdictions’ capabilities in the section entitled, “Improvement Opportunities.” Regardless of the differing capabilities from one jurisdiction to another, all opportunities suggested are worded exactly the same. A comparison of each town and village capability assessments and limitations shows jurisdiction limitations are often misaligned with the Excel spreadsheet of proposed mitigation actions. Each annex can be improved if they modified suggested strategies and actions to be more closely address local limitations. For example:
  - Improving Opportunities for Planning and Regulatory Capabilities: The focus of improvements suggested in this sub-section primarily focuses on improving the resilience of local roads and infrastructure. Although the annexes report hundreds of residential sites are subjected to flooding with regulatory FIRMs that have no flood data, suggestions are missing that acknowledge and address residential flooding in unmapped area of the FIRM.
  - Improving Opportunities for Administrative and Technical Capabilities: This subsection suggests towns focus on potential “unforeseen challenges” without suggesting steps jurisdictions can take to update inadequate FIRMS adopted between 1979 to 1985.
  - Improving Opportunities for NFIP Participation: Improvements suggested in this subsection include the development of a substantial damage management plan. However, none of the annexes propose an action to actually develop such a plan. This subsection also proposes each jurisdictions adopt and enforce higher standards to protect CFs without basing such determinations on an updated, and current FIRM that accurately identifies areas vulnerable to flooding.

The HMP and all annexes can be improved if they acknowledge the limitations of their outdated FIRMs and more closely align suggested opportunities for improvement with their proposed mitigation actions.

- C2-a: The NFIP participation tables in each annex can be improved if each jurisdiction confirm whether they enforce the NYS/DEC requirements for freeboard. This is important because many jurisdictions within Columbia County have local Flood Damage Prevention Laws adopted between 1979 and 1988, which is before the NYS freeboard requirements became effective in 2003 and 2010.
- C4-a: While Columbia County HMP Section 8.2, pages 8-3 to 8.12, presents an analysis of past and current mitigation actions by mitigation category, the analysis shows a comprehensive and broad range of mitigation actions proposed in the 2025 HMP update are not presented in the Excel spreadsheet of actions. The HMP and annexes can be improved if additional actions were proposed to expand the range of actions proposed. Examples of such new actions could include:

- Protect wetlands and sensitive environmental areas that naturally mitigate flood risks.
- Strengthen development and land use regulations that protect historic sites built in the 18<sup>th</sup> and 19<sup>th</sup> centuries.
- Strengthen existing structures built before the adoption of stringent building codes.
- Set up administrative procedures to collect flood statistics related to residential and commercial sites, which broadens the statistics beyond simply the NFIP statistics.
- Note areas of the FIRM that do not accurately identify flood prone areas.
- See the 2025 FEMA Local Mitigation Policy Guide for additional explanation.
- There are actions within annexes that are labeled as complete in the “Current Status” column, however, they are also labeled as “Yes” in the “Keep for Plan Update” column. Keep for Plan Update should be for projects that were previously proposed or started.
- While the plan describes the types of potential mitigation actions a jurisdiction might consider (Section 8.2.1), the plan annexes would be improved if they documented the options considered to address each specific problem identified before selecting the best action selected to mitigate the problem. It is always best to consider options before selecting the best option to implement. Sometimes during the plan’s implementation, the selected action proves to be infeasible. When this is the cases, one of the possible previously considered options may be selected for implementation and documenting these options would facilitate that process.
- Each selected action is intended to mitigate a problem, and a description of the problem is included in the plan. The plan includes several problem descriptions that imply a solution, which biases a consideration of alternatives. Problem statements should not imply a solution.
  - For example, the City of Hudson’s Action #5 states the problem as the “*Pump station capacity needs expanding*” and the selected action is to upgrade the sewer pump station. The plan would be improved if the statement described the consequences when the specific pump station overflows, and some options to consider could be to limit the flow of water reaching the pump station, possibly by diverting stormwater, constructing a detention pond, or constructing a retention pond.

## Element E. Plan Update

### Strengths

- The status review of the mitigation actions from the previous plan included an explanation of the status, which is very helpful for readers of the plan to understand why some actions were deleted.

### Opportunities for Improvement

- The plan would be improved if in introducing the Review of Prior Actions it was noted that this status information is a key element of preparing an updated Risk Assessment. Each previous action was included in the prior plan to address a problem, making it important to consider whether the previously cited problems have been sufficiently addressed.

## Element G. HHPD Requirements (Optional)

### Opportunities for Improvement

- The Churchtown Dam is located in the Town of Taghkanic and the Summit Street Lake Dam is located in the Village of Philmont. Both these jurisdictions have met the minimum requirement to have these dams eligible for HHPD grants. Notwithstanding this finding, the plans lack an assessment of the downstream risks should either dam fail to perform as designed, and neither plan commented on the impact natural hazards might have on each dam. Future updates of the plan should include this information.

## Element H. Additional State Requirements (Optional)

### Strengths

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### Opportunities for Improvement

- H1-a/H1-b: Page 94 of the Columbia County HMP defines critical and essential facilities as police, fire, EMS, schools/colleges, shelters, senior facilities, and medical facilities. Although Table 5-4, page 5-5/95 reports whether emergency response sites are protected from flood risks, Tables 5-5 to 5-11 pages 5-6/96 to 5-11/101 that list additional subsets of critical facilities do not report if CFs are protected from flood risk. The HMP can be improved if it reported whether CFs listed on HMP pages 96 to 101 are protected from flood risk.
- H1-b/H1-c: HMP page 108 list facilities that are essential to Columbia County that are highly vulnerable to flooding. However, the table list does not specify whether the flood risk is to the 100 year annual flood or worst case scenario of flood risk. The table can be improved if this additional information were provided.
- H1-c: Tables 6-6 and 6-7 on HMP pages 108-109 respectively, list essential/critical facilities that are vulnerable to flood risk without reporting if each facility listed is protected from the risk. Tables 6-6 and 6-7 can be improved if an additional column was added to the table that reported if each facility is protected and the action project number proposed to ensure the future protection of each facility.
- H1-c: The Towns of New Lebanon and Stockport both list critical facilities that have an “unknown” status for protection to the 500-year flood event as they are both privately owned. It may be a good idea to create an outreach action between these privately owned facilities to determine their flood protection level, as well as notifying them that they may be susceptible to flooding.
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## Technical Issues

- Beginning on Page 335 of Volume II, the left side of the footer is cut off. The viewable portion shows, “BIA COUNTY MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN 5-YEAR UPDATE.
- The cover pages say June 2025 however the plan final draft is August 2025