

9.30 Village of Waterford

This section presents the jurisdictional annex for the Village of Waterford. Representatives from the Village of Waterford did not provide any updates to this annex for the 2019 HMP Update. The population data was updated to be consistent with the rest of this plan.

9.30.1 Hazard Mitigation Plan Point of Contact

Primary Point of Contact	Alternate Point of Contact
Paul McInerney 65 Broad Street; Waterford, NY 12188 518-237-3341	Craig Falcone – Director of Public Works 65 Broad Street; Waterford, NY 12188 518-235-9898

9.30.2 Village Profile

Population

2,059 (American Community Survey 5-Year 2016 Estimates)

Location

The Village of Waterford is located in the southeast part of the Town of Waterford, northwest of the City of Troy. Waterford is on the west bank of the Hudson River and north of Peebles Island State Park. The village was at the northern extreme of navigation on the Hudson River and was later the eastern terminus of the Erie Canal by way of the Champlain Canal. Locks 2, 3, 4, 5, and 6, the Waterford flight of locks for the Erie Canal, are located here, along with former locks of the Champlain Canal. While much of the surrounding town has a high elevation, the village of Waterford is very low. Its position at the convergence of both the Erie and Champlain Canals as well as the Mohawk and Hudson Rivers and its relatively low elevation have contributed to many floods. Conjoined US Route 4 and New York State Route 32 diverge in Waterford village with US-4, as Broad Street, crossing the Hudson River into Rensselaer County and NY-32 crossing the Mohawk River. County Roads 96, 6th Street, and 97, Washington Avenue, lead into the village from the northwest. According to the U.S. Census Bureau, the village has a total area of 0.4 square miles, with 0.3 square miles of it land and 0.1 square miles (22.22-percent) of it water.

Climate

Saratoga County, with all its municipalities, generally experiences seasonable weather patterns characteristic of the northeastern U.S. Warm summers are typically experienced, with occasional high temperatures and humidity. Midsummer temperatures typically range from 60°F to 83°F (Fahrenheit). The winters of Saratoga County are long and cold, with temperatures typically ranging from 12°F to 30°F (Fahrenheit). During the winter, temperatures are cooler than the

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temperatures in areas located near large bodies of water. Snow accumulates to an average depth of 68.7 inches each year.

Brief History

The site of the village was occupied as "Half Moon Point" in the 17th Century. It was then in the territory of Mohican natives. This early village was at the fort between Peebles Island and the mainland. The approximate location of this fort is in the area of the Second Avenue Bridge. Though the construction of the Erie Canal destroyed much of the fort for which the village is named, remnants of an unnamed and often submerged island can still be seen southwest of the entrance to the canal. The village claims to be the oldest continuously incorporated village in the U.S. It was the first village incorporated by the state legislature in 1794, while in the Town of Halfmoon and was an established political entity before the formation of the Town of Waterford.

Governing Body Format

No information provided at this time.

Growth/Development Trends

No development is anticipated at this time. However, streetscape, new curbs and sidewalks, and lights will be provided.

9.30.3 Village-Specific Hazard Information

Detailed hazard event histories can be found in the Previous Occurrences and Losses sections of each hazard profile in Section 5. Table 9.30-1 summarizes the Village of Waterford’s ranking of the natural hazards based on probability of occurrence and impacts to the village.

Table 9.30-1 Village of Waterford Hazard Ranking

Rank #	Hazard Type	Probability of Occurrence	Risk Ranking Score ^a	Hazard Ranking ^b
N/A	Drought	No information provided	No information provided	No information provided
4	Earthquake	Rare	11	Low
1	Flood (riverine, flash, coastal and urban flooding)	Frequent	54	High
N/A	Extreme Temperature	No information provided	No information provided	No information provided
3	Ground Failure	Occasional	24	Medium
N/A	Invasive Species	No information provided	No information provided	No information provided

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Rank #	Hazard Type	Probability of Occurrence	Risk Ranking Score ^a	Hazard Ranking ^b
2	Severe Storm (windstorms, thunderstorms, hail, lightning and tornados)	Frequent	51	High
1	Severe Winter Storm (heavy snow, blizzards, ice storms)	Frequent	54	High
N/A	Wildfire	No information provided	No information provided	No information provided

- a. Risk ranking score = Probability x Impact
b. High = Total hazard priority risk ranking score of 31 and above; Medium = Total hazard priority risk ranking of 16-30; and Low = Total hazard risk ranking below 15
c. N/A = Not available. The Village of Waterford did not rank the new hazards profiled in the 2019 HMP Update. The rankings in this table reflect the village's ranking of the hazards in the previous HMP.

9.30.4 Capability Assessment

This section identifies the following capabilities of the local jurisdiction:

- Legal and regulatory capability;
- Administrative and technical capability;
- Fiscal capability; and,
- Community classification.

Legal and Regulatory Capability

Table 9.30-2 Legal and Regulatory Capability of the Village of Waterford

Regulatory Tools (Codes, Ordinances, Plans)	Local Authority (Y or N)	Prohibitions (State or Federal) (Y or N)	Higher Jurisdictional Authority (Y or N)	State Mandated (Y or N)	Code Citation (Section, Paragraph, Page Number, date of adoption)
1) Building Code	Y	N	Y	N	Chapter 205 8/30/1965
2) Zoning Ordinance	Y	N	N	N	Chapter 205 8/30/1965
3) Subdivision Ordinance	N	N	N	N	Not provided
4) NFIP Flood Damage Prevention Ordinance (if you are in the NFIP, you must have this.)	Y	Y	Y	Y	Chapter 115 4/27/1995
5) Growth Management	N	N	N	N	Not provided
6) Floodplain Management / Basin Plan	Y	Y	Y	N	Chapter 201 1/24/2007

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Regulatory Tools (Codes, Ordinances, Plans)	Local Authority (Y or N)	Prohibitions (State or Federal) (Y or N)	Higher Jurisdictional Authority (Y or N)	State Mandated (Y or N)	Code Citation (Section, Paragraph, Page Number, date of adoption)
7) Stormwater Management Plan/Ordinance	Y	N	Y	Y	Chapter 132 12/12/2007
8) Comprehensive Plan / Master Plan/ General Plan	Y	N	N	N	July 2002
9) Capital Improvements Plan	N	N	N	N	Not provided
10) Site Plan Review Requirements	Y	Y	Y	N	Chapter 167 1/24/2007
11) Open Space Plan	N	N	N	N	Not provided
12) Economic Development Plan	N	N	N	N	Not provided
13) Emergency Response Plan	Y	N	Y	Y	Not provided
14) Post Disaster Recovery Plan	N	N	N	N	Not provided
15) Post Disaster Recovery Ordinance	N	N	N	N	Not provided
16) Real Estate Disclosure req.	N	N	N	N	Not provided
17) Other [Special Purpose Ordinances (i.e., critical or sensitive areas)]	N	Y	Y	N	Not provided

Administrative and Technical Capability

Table 9.30-3 Administrative and Technical Capability of the Village of Waterford

Staff/ Personnel Resources	Available (Y or N)	Department/ Agency/Position
1) Planner(s) or Engineer(s) with knowledge of land development and land management practices	Y	By Contract
2) Engineer(s) or Professional(s) trained in construction practices related to buildings and/or infrastructure	Y	Joe Clark – Building Inspector By Contract
3) Planners or engineers with an understanding of natural hazards	Y	By Contract
4) NFIP Floodplain Administrator (if you are in the NFIP, you must have one.)	Y	Robert Lowther – Zoning Commission Mark Mahoney
5) Surveyor(s)	Y	By Contract

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Staff/ Personnel Resources	Available (Y or N)	Department/ Agency/Position
6) Personnel skilled or trained in “GIS” applications	Y	By Contract
7) Scientist familiar with natural hazards in the Village of Waterford.	Y	By Contract
8) Emergency Manager	Y	John Tanchak – Public Safety Commissioner
9) Grant Writer(s)	Y	By Contract
10) Staff with expertise or training in benefit/cost analysis	Y	Budget Official

Fiscal Capability

Financial Resources	Accessible or Eligible to use (Yes/No/Don't know)
1) Community development Block Grants (CDBG)	Yes
2) Capital Improvements Project Funding	Yes
3) Authority to Levy Taxes for specific purposes	Yes
4) User fees for water, sewer, gas or electric service	No
5) Impact Fees for homebuyers or developers of new development/homes	Yes
6) Incur debt through general obligation bonds	Yes
7) Incur debt through special tax bonds	Yes
8) Incur debt through private activity bonds	No
9) Withhold public expenditures in hazard-prone areas	Yes
10) State mitigation grant programs (e.g. NYSDEC, NYCDEP)	Yes
11) Other	Not provided

Community Classifications

Table 9.30-4 Community Classifications of the Village of Waterford

Program	Classification	Date Classified
Community Rating System (CRS)	NP	N/A
Building Code Effectiveness Grading Schedule (BCEGS)	NP	N/A
Public Protection	NP	N/A
Storm Ready	NP	N/A
Firewise	NP	N/A

N/A = Not applicable. NP = Not participating. - = Unavailable.

The classifications listed above relate to the community’s effectiveness in providing services that may impact its vulnerability to the natural hazards identified. These classifications can be viewed

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as a gauge of the community's capabilities in all phases of emergency management (preparedness, response, recovery and mitigation) and are used as an underwriting parameter for determining the costs of various forms of insurance. The CRS class applies to flood insurance while the BCEGS and Public Protection classifications apply to standard property insurance. CRS classifications range on a scale of 1 to 10 with class one being the best possible classification, and class 10 representing no classification benefit. Firewise classifications include a higher classification when the subject property is located beyond 1000 feet of a creditable fire hydrant and is within 5 road miles of a recognized Fire Station. Criteria for classification credits are outlined in the following documents:

- The Community Rating System Coordinators Manual;
- The Building Code Effectiveness Grading Schedule;
- The ISO Mitigation online ISO's Public Protection website at: <https://www.isomitigation.com/ppc/>;
- The National Weather Service Storm Ready website at <https://www.weather.gov/stormready/>; and,
- The National Firewise Communities website at <http://firewise.org/>.

9.30.5 Mitigation Strategy

Proposed Hazard Mitigation Initiatives

Table 9.30-5 Proposed Hazard Mitigation Initiatives of the Village of Waterford

Initiative	Mitigation Initiative	Applies to New and/or Existing Structures*	Hazard(s) Mitigated	Goals Met	Objectives Met	Lead Agency	Support agencies	Estimated Cost	Sources of Funding	Timeline
VWF-1a	Where appropriate, support retrofitting of structures located in hazard-prone areas to protect structures from future damage, with repetitive loss and severe repetitive loss properties as priority. Identify facilities that are viable candidates for retrofitting based on cost- effectiveness versus relocation. Where retrofitting is determined to be a viable option, consider implementation of that action based on available funding.	Existing	Flood, Severe Storm	1, 2, 3, 5	1-1, 1-2, 1-3, 2-2, 2-3, 2-4, 3-1, 3-5	Municipality (likely through NFIP Floodplain Administrator)	NYS DHSES, FEMA	High	FEMA Mitigation Grant Programs and local budget (or property owner) for cost share	Long Term

Initiative	Mitigation Initiative	Applies to New and/or Existing Structures*	Hazard(s) Mitigated	Goals Met	Objectives Met	Lead Agency	Support agencies	Estimated Cost	Sources of Funding	Timeline
VWF-1b	Where appropriate, support purchase, or relocation of structures located in hazard-prone areas to protect structures from future damage, with repetitive loss and severe repetitive loss properties as priority. Identify facilities that are viable candidates for relocation based on cost-effectiveness versus retrofitting. Where relocation is determined to be a viable option, consider implementation of that action based on available funding.	Existing	Flood, Severe Storm	1, 2, 3, 5	1-1, 1-2, 1-3, 2-2, 2-3, 2-4, 3-1, 3-5	Municipality (likely through NFIP Floodplain Administrator)	NYS DHSES, FEMA	High	FEMA Mitigation Grant Programs and local budget (or property owner) for cost share	Long Term
VWF-2	Consider participation in incentive-based programs such as CRS.	New & Existing	Flood	1, 2, 5	1-1, 1-3, 1-6, 2-1, 2-2, 2-3, 2-4, 5-2	Municipality (likely through NFIP Floodplain Administrator)	NYS DHSES, ISO, FEMA	Low - Medium	Local Budget	Ongoing per SPDES GP-0-08-002
VWF-3	Continue to support the implementation, monitoring, maintenance, and updating of this Plan, as defined in Section 7.0	New & Existing	All Hazards	All	All	Municipality (through mitigation planning point of contacts)	County (through Mitigation Planning Coordinator), NYS DHSES	Low – High (for 5-year update)	Local Budget, possibly FEMA Mitigation Grant Funding for 5-year update	Short Term

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Initiative	Mitigation Initiative	Applies to New and/or Existing Structures*	Hazard(s) Mitigated	Goals Met	Objectives Met	Lead Agency	Support agencies	Estimated Cost	Sources of Funding	Timeline
VWF-4	Strive to maintain compliance with, and good-standing in the National Flood Insurance program.	New & Existing	Flood	1, 2, 4	1-1, 1-2, 1-3, 1-8, 2-2, 2-3, 2-4, 4-1, 4-2, 4-3, 4-4	Municipality (likely through NFIP Floodplain Administrator)	NYS DHSES, ISO, FEMA	Low - Medium	Local Budget	Ongoing
VWF-5	Continue to develop, enhance, and implement existing emergency plans.	New & Existing	All Hazards	1, 3	1-1, 1-7, 3-2, 3-4, 3-5	Municipal Emergency Manager with support from County OEM and NYS DHSES	County Emergency Management, NYS DHSES	Low - Medium	Local Budget	Ongoing
VWF-6	Create/enhance/ maintain mutual aid agreements with neighboring communities.	New & Existing	All Hazards	3, 5	3-4, 5-1, 5-3	Local Emergency Management, DPW and Roads	Surrounding municipalities and County	Low - Medium	Local Budget	Ongoing – Long-term depending on initiative
VWF-7	Support County-wide initiatives identified in Section 9.1 of the County Annex.	New & Existing	All Hazards	All	All	Local departments (as applicable for specific initiative)	County and Regional agencies (as appropriate for initiative)	Low - High	Existing programs and grant funding where applicable	Ongoing per SPDES GP-0-08-002

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Initiative	Mitigation Initiative	Applies to New and/or Existing Structures*	Hazard(s) Mitigated	Goals Met	Objectives Met	Lead Agency	Support agencies	Estimated Cost	Sources of Funding	Timeline
VWF-8	Support the Installation/Implementation of Community Emergency Alert System	New & Existing	All Hazards	1, 3, 5	1-1, 3-1, 3-3, 3-5, 3-6, 5-1	Municipality	Watershed districts (if applicable); neighboring municipalities;	Medium	FEMA HMA	Ongoing
VWF-9	Create a mitigation support fund to provide matching funds on an ongoing basis for municipality and residential mitigation projects which will fund cost-sharing portions of projects and be replenished during the annual budget cycle	New & Existing	All Hazards	1, 2, 3, 5	1-3, 1-9, 2-5, 3-1, 5-2	Municipality		Medium	Operating budget	Long Term
VWF-10	Amend the Zoning Ordinances of the Town and Village to correct existing ambiguities and problems and incorporate zoning tools to implement recommendations in the Comprehensive Plan and the Local Waterfront Revitalization Plan. Per the Comprehensive Plan	N/A	N/A	1, 3	1-3, 1-7, 3-1	Village Board		Low	Operating budget	Long Term
VWF-11	Investigate and implement mitigation actions to mitigate flooding at Waterford Volunteer Fire CO and Kavanaugh Hook & Ladder CO which are located in the flood hazard areas.	Existing	Flood, Severe Storm	1, 3	1-1, 3-4, 3-6	Municipality	Fire Dept/District	Low (Could be high once action is decided and implemented)	Local (FEMA HMA and local match for implementation of action)	Long Term

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Initiative	Mitigation Initiative	Applies to New and/or Existing Structures*	Hazard(s) Mitigated	Goals Met	Objectives Met	Lead Agency	Support agencies	Estimated Cost	Sources of Funding	Timeline
VWF-12	Investigate and implement mitigation actions to mitigate flooding at Waterford Police Dept. which is located in the flood hazard area.	Existing	Flood, Severe Storm	1, 3	1-1, 3-4, 3-6	Municipality	Police Dept	Low (Could be high once action is decided and implemented)	Local (FEMA HMA and local match for implementation of action)	Long Term
VWF-13	Investigate and implement mitigation actions to mitigate flooding at the wastewater treatment plant which is located in the flood hazard area.	Existing	Flood, Severe Storm	1, 3	1-1, 3-4, 3-6	Municipality	WWTF	Low (Could be high once action is decided and implemented)	Local (FEMA HMA and local match for implementation of action)	Long Term

*Does this mitigation initiative reduce the effects of hazards on new and/or existing buildings and/or infrastructure?

Notes: Short term = 1 to 5 years; Long Term= 5 years or greater; OG = On going program; DOF = Depending on funding; NA = Not applicable; PDM = Pre-Disaster Mitigation Grant Program.

Analysis of Mitigation Actions

This table summarizes the participant's mitigation actions by hazard of concern and the six mitigation types to illustrate that the Village has selected a comprehensive range of actions/projects.

Table 9.30-6 Analysis of Mitigation Actions of the Village of Waterford

Hazard of Concern	Type of Mitigation Action					
	Prevention	Property Protection	Public Education and Awareness	Natural Resource Protection	Emergency Services	Structural Projects
Drought	VSW-3, VSW-7, VSW-9, VSW-10	VSW-3, VSW-7	VSW-3, VSW-7	VSW-3, VSW-7	VSW-3, VSW-5, VSW-6, VSW-7, VSW-8	VSW-3, VSW-

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Hazard of Concern	Type of Mitigation Action					
	Prevention	Property Protection	Public Education and Awareness	Natural Resource Protection	Emergency Services	Structural Projects
Earthquake	VSW-3, VSW-7, VSW-9, VSW-10	VSW-3, VSW-7	VSW-3, VSW-7	VSW-3, VSW-7	VSW-3, VSW-5, VSW-6, VSW-7, VSW-8	VSW-3, VSW-7
Extreme Temperatures	VSW-3, VSW-7, VSW-9, VSW-10	VSW-3, VSW-7	VSW-3, VSW-7	VSW-3, VSW-7	VSW-3, VSW-5, VSW-6, VSW-7, VSW-8	VSW-3, VSW-5
Flooding (riverine, flash, coastal and urban flooding)	VSW-2, VSW-3, VSW-4, VSW-7, VSW-9, VSW-10	VSW-1a and b, VSW-2, VSW-3, VSW-4, VSW-7, VSW-11-13	VSW-1a and b, VSW-2, VSW-3, VSW-4, VSW-7	VSW-3, VSW-7,	VSW-2, VSW-3, VSW-5, VSW-6, VSW-7, VSW-8	VSW-3, VSW-7
Ground Failure	VSW-3, VSW-7, VSW-9, VSW-10	VSW-3, VSW-7	VSW-3, VSW-7	VSW-3, VSW-7	VSW-3, VSW-5, VSW-6, VSW-7, VSW-8	VSW-3, VSW-7
Invasive Species	VSW-3, VSW-7, VSW-9, VSW-10	VSW-3, VSW-7	VSW-3, VSW-7	VSW-3, VSW-7	VSW-3, VSW-5, VSW-6, VSW-7, VSW-8	VSW-3, VSW-5
Severe Storms (windstorms, thunderstorms, hail, lightning and tornados)	VSW-2, VSW-3, VSW-4, VSW-7, VSW-9, VSW-10	VSW-1a and b, VSW-2, VSW-3, VSW-4, VSW-7, VSW-11-13	VSW-1a and b, VSW-2, VSW-3, VSW-4, VSW-7	VSW-3, VSW-7	VSW-2, VSW-3, VSW-5, VSW-6, VSW-7, VSW-8	VSW-3, VSW-7
Severe Winter Storm (heavy snow, blizzards, ice storms)	VSW-3, VSW-7, VSW-9, VSW-10	VSW-3, VSW-7	VSW-3, VSW-7	VSW-3, VSW-7	VSW-3, VSW-5, VSW-6, VSW-7, VSW-8	VSW-3, VSW-7
Wilfire	VSW-3, VSW-7, VSW-9, VSW-10	VSW-3, VSW-7	VSW-3, VSW-7	VSW-3, VSW-	VSW-3, VSW-5, VSW-6, VSW-7, VSW-8	VSW-3, VSW-5

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Hazard of Concern	Type of Mitigation Action					
	Prevention	Property Protection	Public Education and Awareness	Natural Resource Protection	Emergency Services	Structural Projects

Notes:

1. **Prevention:** Government, administrative or regulatory actions or processes that influence the way land and buildings are developed and built. These actions also include public activities to reduce hazard losses. Examples include planning and zoning, floodplain local laws, capital improvement programs, open space preservation, and storm water management regulations.
2. **Property Protection:** Actions that involve (1) modification of existing buildings or structures to protect them from a hazard or (2) removal of the structures from the hazard area. Examples include acquisition, elevation, relocation, structural retrofits, storm shutters, and shatter-resistant glass.
3. **Public Education and Awareness:** Actions to inform and educate citizens, elected officials, and property owners about hazards and potential ways to mitigate them. Such actions include outreach projects, real estate disclosure, hazard information centers, and school-age and adult education programs.
4. **Natural Resource Protection:** Actions that minimize hazard loss and also preserve or restore the functions of natural systems. These actions include sediment and erosion control, stream corridor restoration, watershed management, forest and vegetation management, and wetland restoration and preservation.
5. **Emergency Services:** Actions that protect people and property, during and immediately following, a disaster or hazard event. Services include warning systems, emergency response services, and the protection of essential facilities.
6. **Structural Projects:** Actions that involve the construction of structures to reduce the impact of a hazard. Such structures include dams, setback levees, floodwalls, retaining walls, and safe rooms.

Prioritization of Mitigation Initiatives

Table 9.30-7 Prioritization of Mitigation Initiatives of the Village of Waterford

Initiative #	# of Objectives Met	Benefits	Costs	Do Benefits equal or exceed Costs? (Yes or No)	Is project Grant eligible? (Yes or No)	Can Project be funded under existing programs/budgets? (Yes or No)	Priority (High, Med., Low)
VWF-1a	8	H	H	Y	Y	N	M-H*
VWF-1b	8	H	H	Y	Y	N	M-H*
VWF-2	8	M	L	Y	N	Y	H
VWF-3	28	M	M	Y	N (Yes for 5 year update)	Y	H
VWF-4	11	L	L	Y	N	Y	H
VWF-5	5	M	L	Y	N	Y	M
VWF-6	35	M	L	Y	N	Y	H
VWF-7	28	H	L-M	Y	Dependant on specific initiative	Dependant on specific initiative	M-H (dependant)
VWF-8	6	M	M	Y	Y	Y (local match)	M
VWF-9	6	M	M	Y	N	Y	H
VWF-10	3	L	L	Y	N	?	L
VWF-11	3	M-H	L	Y	Dependant on specific initiative	Dependant on specific initiative	M-H (dependant)
VWF-12	3	M-H	L	Y	Dependant on specific initiative	Dependant on specific initiative	M-H (dependant)
VWF-13	3	M-H	L	Y	Dependant on specific initiative	Dependant on specific initiative	M-H (dependant)

Notes: H = High. L = Low. M = Medium. N = No. N/A = Not applicable. Y = Yes.

*This initiative has a Medium priority based on the prioritization scheme used in this planning process (implementation based on grant funding), however it is recognized that addressing repetitive and severe repetitive loss properties is considered a high priority by Federal Emergency Management Agency (FEMA) and NYS Division of Homeland Security and Emergency Services (NYS DHSES) (as expressed in the State HMP), and thus shall be considered a High priority for all participants in the planning process.

Explanation of Priorities

- High Priority** - A project that meets multiple objectives (i.e., multiple hazards), benefits exceeds cost, has funding secured or is an on-going project and project meets eligibility requirements for the Hazard Mitigation Grant Program (HMGP) or Pre-Disaster

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Mitigation Grant Program (PDM) programs. High priority projects can be completed in the short term (1 to 5 years).

- **Medium Priority** - A project that meets goals and objectives, benefits exceeds costs, funding has not been secured but project is grant eligible under, HMGP, PDM or other grant programs. Project can be completed in the short term, once funding is completed. Medium priority projects will become high priority projects once funding is secured.
- **Low Priority** - Any project that will mitigate the risk of a hazard, benefits do not exceed the costs or are difficult to quantify, funding has not been secured and project is not eligible for HMGP or PDM grant funding, and time line for completion is considered long term (1 to 10 years). Low priority projects may be eligible other sources of grant funding from other programs. A low priority project could become a high priority project once funding is secured as long as it could be completed in the short term.

Prioritization of initiatives was based on above definitions: Yes.

Prioritization of initiatives was based on parameters other than stated above: Not Applicable.

9.30.6 Future Needs to Better Understand Risk/Vulnerability

None at this time.

9.30.7 Additional Comments

No additional comments at this time.