



NAFSMA Floodplain Management Position Paper

(Adopted by Directors on November 14, 2023)

I. Introduction

The National Association of Flood and Stormwater Management Agencies (NAFSMA), founded in 1978, is an organization of public agencies whose function is the protection of lives, property, and economic activity from the adverse impacts of storm and flood waters. NAFSMA member agencies either belong to the National Flood Insurance Program (NFIP) or work with communities that belong to the NFIP.

Our mission for over 40 years has been to advocate public policy and encourage technologies in watershed management that focus on flood protection, floodplain, and stormwater management. NAFSMA understands that infrastructure and activities providing flood damage reduction improve sustainability and resiliency within a community, but that all flood risks can never be eliminated.

II. NAFSMA Position on Federal Emergency Management Agency Programs

NAFSMA has identified the following areas of interest about the management and administration of existing FEMA programs as they affect the public service functions of its member agencies. NAFSMA's positions regarding these areas of interest are presented on the following pages.

While the positions presented in this position paper focus on existing FEMA programs, there are three subjects separately addressed by NAFSMA in companion documents:

- **Urban Flooding** – On this subject, technical support at the federal level would be appreciated, but regulation and management should be locally controlled. This subject is further addressed in the [NAFSMA Position on Urban Flooding](#), approved December 4, 2019.
- **Climate Change and Climate Equity** - outlined in the [NAFSMA Climate Adaption Policy](#), approved September 15, 2021
- **Levees** – many NAFSMA members are owner-operators of levees, and these systems present a suite of special considerations that are discussed in the [NAFSMA Levee Subcommittee Position Paper](#), approved October 20, 2021.

National Flood Insurance Program

Continuing Authorization of the NFIP - Reauthorization of the NFIP needs to be long-term to afford certainty and provide stability for participating communities striving to increase their resiliency. While short-term reauthorizations are preferable to expiration, they are not an effective means by which to encourage programmatic change at the local level targeting improved resilience.

Risk Rating 2.0 - NAFSMA supports the intent of Risk Rating 2.0 to create a more equitable and fiscally resilient program with premiums that better reflect each property's individual flood risk. For successful implementation of this program, FEMA needs to provide more information on the rating methodology, including clarity around how the various adjustment factors were determined, how local community mitigation projects impact the ratings, how properties behind levees will be handled, and more training and support for public agency staff. NAFSMA members make many decisions based on flood risk and would benefit from having community level flood risk data to inform their efforts. The use of premiums as the means to communicate risk at the individual property level leaves communities without access to the best information upon which to base their decisions about future development and infrastructure investment.

NAFSMA urges FEMA to make the risk rating tool available to local floodplain managers so that they can better understand the impacts to their communities, assess the reasonableness of the rating results, and better assist elected officials and residents. NAFSMA further requests that FEMA provide a means by which a community can challenge the risk determinations in their communities, including for individual properties or larger areas. With respect to leveed areas, it would be helpful for FEMA to provide the owner-operator of each recognized levee system a listing of the data, and its source, used to determine that area's flood risk and insurance premiums.

Please also see the NAFSMA Levee Subcommittee Position Paper, which includes Risk Rating 2.0 as an area of focus.

Private Market Development - NAFSMA supports enhancing opportunities for the private market to provide flood insurance and supports requiring fees for private insurance policies equal to those for an NFIP policy to help fund FEMA's mitigation and mapping programs.

Debt Forgiveness - NAFSMA supports Congress's efforts to forgive the NFIP's debt. This debt has been accumulating for years primarily due to several large events. Servicing this debt causes premiums to be increased and places an unfair burden on current and future policy holders. NFIP premiums will never be able to repay the debt.

Technical Mapping Advisory Council - NAFSMA supports efforts to use The Technical Mapping Advisory Council (TMAC) to bring flood management professionals from across the entire spectrum to collaborate on flood risk mapping activities. NAFSMA is committed to active participation on the TMAC and believes that this entity can play a vital role in helping to identify future policy directions for the NFIP.

Affordability - NAFSMA supports Congressional action to enact a means-based assistance program to address affordability, including a provision that would exempt those properties from needing a benefit cost analysis (BCA) for any individual mitigation projects or qualifying for any federal grants.

No Other Hazards Insured by NFIP - NAFSMA opposes adding insurance for other natural hazards to the NFIP. Adding insurance for other hazards to the NFIP would unnecessarily further complicate the floodplain management efforts of NAFSMA's members.

Flood Hazard Mapping Program

Continuation of Risk MAP - It is very important for FEMA to ensure the integrity of their flood mapping products through frequent updates of the current mapping inventory. It is also important for FEMA to provide mapping for unmapped communities and areas. NAFSMA supports completion of mapping the entire nation while also updating older maps to represent flood risk more accurately.

Funding of Risk MAP - Because the benefits of Risk MAP go beyond the sale of flood insurance, flood insurance policy holders should not be required to bear the full cost of the Risk MAP program—rather all program beneficiaries should participate in its funding. NAFSMA supports inclusion of Risk MAP funding in the federal budget.

Recognize Protection Provided by Levees - NAFSMA has participated as an active stakeholder in developing procedures regarding mapping flood hazards associated with levees and urges that insurance policy premiums fully reflect the risk mitigation provided by the levees.

Continuation and Expansion of CTP – FEMA's Cooperating Technical Partners (CTP) initiative is of particular interest to NAFSMA. Many NAFSMA member agencies have the expertise and financial capability to conduct the types of activities, such as hydrologic and hydraulic modeling, topographic mapping, and floodplain delineation, which are used to develop Flood Insurance Studies (FISs), DFIRMs and LOMCs. NAFSMA encourages the continuation of the CTP initiative while fully utilizing NAFSMA member agencies as much as possible.

Use of Local Maps - NAFSMA supports the use of mapping products prepared by local governments in the development and modification of FIRMs. Many communities have the expertise and funding sources to conduct the activities associated with developing FISs and FIRMs and often have extensive local knowledge of the watershed that reduces the effort needed in the discovery phase. NAFSMA is willing to work with FEMA to develop guidelines for local governments to produce maps to FEMA's standards fully utilizing member agencies as much as possible. This effort would also ultimately help alleviate the burden of FEMA to unilaterally update maps in the future as new data becomes available.

Digital Mapping Environment - NAFSMA encourages the investment in quality foundational data and improved processes to transform the floodplain mapping program to a dynamic, database-derived digital environment for more efficient operations.

Two-Dimensional Floodplain Regulation - NAFSMA supports FEMA's ongoing efforts toward eliminating regulatory obstacles for two-dimensional (2D) floodplain modeling. 2D modeling is the emerging standard of practice for a variety of hydraulic design applications because it provides a more detailed understanding of complex hydraulic conditions, leading to a better representation of flood risk. More work is needed to develop tools to improve efficiency for 2D floodway creation and prepare local floodplain administrators. 2D Rain-on-Mesh (RoM) is a method of 2D modeling that includes coupled hydrologic and hydraulic modeling performed at a watershed scale – 2D

RoM supports FEMA's Future of Flood Risk Data initiative through probabilistic analysis of hydrologic data to produce graduated flood risk results. However, 2D RoM brings up additional concerns related to both modeling and floodplain regulation that need to be fully evaluated and vetted. NAFSMA requests that FEMA develop and share more 2D RoM case studies representing a broad spectrum of watershed conditions.

Future Conditions - In the past, NAFSMA has encouraged and, FEMA has allowed the inclusion of future hydrologic conditions on the FIRMs at the request of the local governments for advisory or regulatory purposes (but not for purposes of flood insurance). NAFSMA continues to encourage FEMA to allow other hazards and changing land use to be shown on the National Flood Hazard Layer (NFHL) at the request of local governments. It is imperative that local governments can recognize, plan, and adapt to their areas' future conditions.

Floodplain Management Projects

Coordination Between Federal Agencies - NAFSMA encourages active engagement among the federal agencies involved in flood risk and floodplain management activities so that federal policies are developed and implemented in an integrated and consistent fashion. NAFSMA encourages continued coordination, especially in matters associated with levee accreditation, risk communication, and maintenance of flood control facilities. The Federal Interagency Floodplain Management Task Force (FIFM_TF) has successfully assembled all federal agencies that impact federal floodplain management policy and has begun work on a unified federal policy. The FIFM_TF membership is currently limited to federal agencies. NAFSMA encourages the FIFM_TF to broaden coordination and undertake ongoing engagement with non-federal stakeholders to achieve an updated unified national floodplain management policy.

Structural Improvements as Mitigation Alternatives - In many cases, the best way to mitigate the flood hazard to existing structures in the floodplain is with remedial projects utilizing structural flood management methods. NAFSMA acknowledges that non-structural methods, such as floodplain regulations, subdivision regulations, land acquisition, and other activities that preserve the natural and beneficial functions of streams, can be appropriate and cost effective in preventive situations dealing with new development. NAFSMA understands that structural improvements are often the most cost effective and timely solutions to manage flood risk in developed or developing areas. Structural solutions can include elements that enhance the natural and beneficial functions of the streams while also reducing flood risk and need to be considered and accepted as mitigation alternatives.

Maintenance Activities Exempt from 404 Permit Requirements - FEMA requires local governments to assure maintenance and flood carrying capacity of flood management projects, such as enlarged channels, as a condition of revising FIRMs to reflect the impacts of the projects on the floodplain. At the same time, the Corps of Engineers under its 404-permit process makes it more difficult and expensive for local governments to perform the required and necessary maintenance, which can cause a reduction in flood carrying capacity. NAFSMA encourages FEMA to work with the Corps of Engineers to develop 404 permit regulations that exempt maintenance of FEMA recognized flood management projects.

Mitigation Grant Programs

Pre- and Post-Disaster Grant Mitigation Programs - NAFSMA supports both pre-and post-disaster grant mitigation programs that reduce disaster losses from future events and urges full funding of the grant programs. In addition, NAFSMA encourages FEMA to support nature-based solutions and alternative delivery methods.

Building Resilient Infrastructure and Communities (BRIC) Program – NAFSMA supports FEMA’s focus on infrastructure projects benefitting disadvantaged communities, nature-based solutions, climate resilience and adaption, and more resilient building codes as exhibited in the BRIC Program. NAFSMA encourages continued efforts to simplify the application process and explore innovative benefit valuation approaches that can help underserved areas qualify for federal funding.

Hazard Mitigation Grant Conditions - FEMA administers grant programs that allow local governments to buy property with high flood risk. Properties acquired through the program prohibit the use of the property for any structural flood management measures which can severely limit the future use of the property and may render the property a liability for the agency. NAFSMA encourages more flexibility of the grant conditions to allow consideration of the use of acquired properties for cost-effective flood management projects that reduce flood hazards and are compatible with the overall objectives of the grant program. For example, modification to a floodway may reduce flood hazard, or the elevation of a roadbed may provide a safe evacuation route from an area subject to flooding, while still preserving the open space intent of the grant programs.

Community Rating System (CRS)

NAFSMA continues to support the CRS program and its encouragement of best practices by providing discounts to communities that incorporate these practices into their floodplain management policies. Recognizing that the risk exposure in a single community may not all be the same, due to floodplain management practices currently being undertaken, we see the opportunity for community level discounts and encouragement of best practice through provision of additional discounts to the most compliant policy holders at a structure specific level. Many structures were built prior to the current floodplain management policies being in place at the community level, but they reap the highest discounts compared to contemporary structures outside the floodplain. The structures that are being built under the current CRS rating policies should be afforded the steepest discounts as an incentive for the continued participation and compliance with program.

Regional Coordination - Floodplains frequently extend across multiple cities or counties and the current CRS program does not adequately recognize or reward regional coordination on flood risk reduction. The CRS program is administered through public agencies with land use authority, whereas flood risk reduction efforts may be administered by a separate regional flood risk reduction agency. The CRS model creates inefficiencies and undue burden on both the land use authority and flood risk reduction agencies by not integrating both agencies into the process. CRS should be encouraging regional coordination and the sharing of resources across floodplains.

Level of Effort Associated with CRS - NAFSMA will continue assisting FEMA in efforts to reduce the level of documentation associated with the CRS and in the identification of common information required by different Federal programs to streamline submittal requirements. NAFSMA encourages a CRS evaluation process that demonstrates more trust in the local agencies.

CRS Task Force - NAFSMA fully supports its continued participation in the CRS Task Force, representing local communities with recommendations regarding the CRS program components.

III. Conclusion

NAFSMA leadership and its member agencies want to work with FEMA on the common goal of protecting the lives and property of American citizens. Moreover, they want their commitment, substantial expertise and unique circumstances to be recognized by FEMA, and to have their work products to be more readily accepted by FEMA. We must work together--to do otherwise is to waste precious resources and frustrate achievement of the shared goal to reduce risk in our nation's many communities subject to flooding.