



National Association of Flood & Stormwater Management Agencies
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NAFSMA Position on Floodplain Management Issues

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Introduction to NAFSMA

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 close to 40 years has been to advocate public policy and encourage technologies in watershed management that focus on flood protection, floodplain and stormwater management. NAFSMA acknowledges activities that offer flood damage reduction help provide sustainability and resiliency within a community, however all flood risks can never be completely eliminated.

NAFSMA Position on Federal Emergency Management Agency Programs

NAFSMA has identified the following areas of interest with regard to 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 follow.

I. National Flood Insurance Program

A. Continuing Authorization of the NFIP

The NFIP's purpose of providing flood insurance to participating communities and promulgating floodplain management standards is an important part of NAFSMA member's floodplain management efforts. NAFSMA recognizes that reforms to the program to increase efficiency and reduce debt are necessary to continue operating the program in a manner that allows the program to remain agile enough to effectively adapt to market changes.

B. Actuarial Rates for Low Risk Policies

The NFIP has moved towards actuarial rates for high risk properties, but has continued to place an asymmetric burden on low risk policyholders. By doing so, the market saturation



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for low risk customers will likely be further reduced by private insurers, thus leaving the NFIP with an increased pool of high risk. NAFSMA recommends reducing low risk policy premiums towards actuarial rates based on industry standards for risk and overhead to manage the program.

C. Private Market Development

NAFSMA supports FEMA enhancing opportunities for the private market to provide flood insurance as long as fees equal to fees on NFIP policies are required on private policies that will be used to assist in funding FEMA's mitigation and mapping programs. NAFSMA also supports requiring communities to join the NFIP as a pre-requisite for private insurance to be sold within their jurisdiction.

D. Expansion of Policies Offered

NAFSMA supports providing FEMA with the authority needed to move forward with new NFIP product offerings, including the possibility of offering lower-cost, narrower policies, in an effort to be competitive with the private market and to increase the pool of policyholders.

E. Continuing Authorization of the TMAC

The Technical Mapping Advisory Council (TMAC) provides a valuable forum for floodplain managers across the entire spectrum to collaborate on floodplain management issues. A wide range of issues has been delegate to the TMAC including residual risk, insurance affordability, mapping and mitigation. NAFSMA is committed to active participation on the TMAC and believes that this entity can play a vital role in helping to implement the policies authorized in the NFIP.

F. No Other Hazards Insured by NFIP

NAFSMA opposes adding insurance for other natural hazards, such as wind insurance, to the NFIP. Adding insurance for other hazards to the NFIP would unnecessarily complicate the floodplain management efforts of NAFSMA's members.



II. Flood Hazard Mapping Program

A. Continuation of Risk MAP

It is very important for FEMA to ensure the integrity of the mapping products through frequent updates. It is also important for FEMA to provide mapping for unmapped communities. NAFSMA supports the activities provided by Risk MAP (Mapping, Analysis, and Planning), including mapping and planning by watershed, analysis of community and national risk, assistance with mitigation planning, and new approaches to risk communication. NAFSMA also supports completion of mapping the entire nation while also updating older maps to more accurately represent flood risk.

B. 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 but rather the public as a whole should participate in funding the program. NAFSMA supports inclusion of Risk MAP funding in the federal budget.

C. Recognize Protection Provided by Levees

NAFSMA has participated as an active stakeholder in developing procedures regarding mapping flood hazards associated with levees. NAFSMA supports FEMA replacement of its Zone D designation in levee-protected areas with risk zones that more appropriately recognize the level of protection provided by these flood control structures. Where levees reduce risk, insurance policy premiums need to reflect the mitigation provided by the levees.

D. 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. These agencies also often design and implement projects, which reduce flood hazards and ultimately revise FISs and DFIRMs. In many cases, these



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agencies are in the best position to certify the completion of these projects and complete the needed map revisions in a timely manner, and to maintain the DFIRM products to keep them current. NAFSMA encourages the continuation of the CTP initiative while utilizing NAFSMA member agencies to the fullest extent possible.

E. 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 utilizing member agencies to the fullest extent possible. This effort would also ultimately help alleviate the burden of FEMA to unilaterally update maps in the future as new data becomes available.

F. 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.

G. Other Hazard Layers on the NFHL

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 to be shown on the National Flood Hazard Layer (NFHL) at the request of local governments.

III. Floodplain Management Projects

A. 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



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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 continue coordination with non-federal stakeholders in order to achieve a unified national floodplain management policy.

B. 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. While non-structural methods, such as floodplain regulations, subdivision regulations, land acquisition, and other activities that preserve the natural and beneficial functions of streams, are most appropriate and cost effective in preventive situations dealing with new development, structural improvements are often the most cost effective and timely solutions in developed areas. Structural solutions can include elements that enhance the natural and beneficial functions of the streams while also reducing flood risk, and should be considered acceptable mitigation alternatives.

C. Maintenance Activities Exempt from 404 Permit Requirements

FEMA requires local governments to assure the maintenance of 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. NAFSMA supports the TMAC appeal to FEMA to work with the Corps of Engineers to develop 404 permit regulations which exempt maintenance of FEMA-credited flood management projects.

IV. Mitigation Grant Programs

A. Mitigation Grant Program Funding



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Past budgets have reduced federal funding for the mitigation grant 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.

B. Hazard Mitigation Grant Conditions

FEMA administers grant programs, which generally impose conditions property acquired through the program that prohibit the use of the property for any structural flood management measures. While it is recognized that FEMA's emphasis is on non-structural solutions, a blanket prohibition on structural solutions can be counterproductive and potentially limit the benefit the community receives from the acquisition. For example, modification to a floodway may reduce flood hazard while still preserving the open space intent of the grant programs. NAFSMA encourages modification 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.

V. Community Rating System (CRS)

A. NAFSMA continues to support the CRS and the efforts it takes to encourage best practices by providing discounts to communities that incorporate these practices into their flood plain management policies. We also believe that community level discounts and best practice encouragement could be expanded by providing additional discounts to the most compliant policy holders at a structure specific level. Not all of the risk exposure in a single community is the same because of floodplain management practices being undertaken currently. Many structures were built prior to these policies being in place at the community level, but reap the highest discounts compared to contemporary structures outside the flood plain. 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.

B. Level of Effort Associated with CRS

NAFSMA is willing to continue assisting FEMA in efforts to reduce paperwork associated with the CRS and in the identification of common information required by different



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Federal programs in an effort to streamline submittal requirements. NAFSMA encourages a CRS evaluation process that demonstrates more trust in the local agencies.

C. CRS Task Force

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

D. CRS Credit for Levees

NAFMSA supports recognizing the flood hazard reduction provided by levees through awarding CRS points for implementation of levees in fully developed watersheds.

Conclusion

The member agencies of NAFSMA want to work with FEMA on the common goal of protecting the lives and property of American citizens. However, they want their commitment, their expertise and their unique circumstances to be recognized by FEMA, and they want their work products to be more readily accepted by FEMA. We have to work together; to do otherwise is to waste precious resources.