

Community Comments on the Proposed Manual Changes

This paper summarizes the comments that communities and others have submitted to us by the August 31 deadline. It is organized by section of the *CRS Coordinator's Manual*. We received four types of comments:

1. Comments on the conduct of the webinars and requests for Continuing Education Credits. These are not included in this paper.
2. Questions on what was proposed that we could answer. These are not included in this paper, unless there were additional comments, in which case our answer is included.
3. Comments that caught incomplete or inconsistent items in the PowerPoints or the papers we've distributed. Those with "OK" at the end mean that we agree and we intend to incorporate the comment or recommendation into the 2012 *CRS Coordinator's Manual* or its guidance documents.
4. Comments and recommendations on the meat of the changes. These should be considered by the Task Force, especially those submitted by a users group or more than one community. These make up the bulk of the table, below.

All of the original comments are included, starting on page 11. The names of the commenters and their communities are redacted. The Section being commented on is in red and bold font.

It is impossible to adequately summarize everyone's concerns. If the issue interests you, please read the original comments.

We had a particularly large number of comments on the proposed Program for Public Information (PPI) in Activity 330 – Outreach Projects, in part because we had two separate webinars on 330 and in part because of the proposed changes.

| Section Element | Comment | Source |
|-----------------|---|--|
| General | Comments | |
| | <p>Many changes will be a burden on staff and communities with limited resources in these economic times. Elected officials are questioning all programs and have trouble seeing if the benefits are worth the costs.</p> <p>"We feel that just as our communities have made a commitment to participation in the CRS program, the CRS program should also make a commitment to the communities. When communities that are currently in the program and have earned certain points, and continue to do those activities, those communities should not be penalized by dropping classes."</p> <p>eThe communities that have been participating in this program over the last decade, keeping the program afloat, are now the ones that are going to be penalized."</p> | <p>Consultant #2 Southern User Group #1 Western City #5 Southern User Group #2 Southwestern City #2 Midwestern State #2 Southern City #7</p> |
| | The increased costs of meeting the new criteria will discourage communities from trying to improve their scores | Southern User Group #1 |

| Section Element | Comment | Source |
|-----------------|--|--|
| | "The general perception is that credits are being taken away in some areas where hard work has previously produced good results but are taken for granted today. Most of the areas where some of these points can be made up will require a lot of additional work and time that many cannot afford." | Southern User Group #2 |
| | "This program appears to be written for smaller communities with a limited floodplain and not for larger urban communities that are almost entirely in a floodplain." | Southern City #7 |
| | "We ... find the proposed changes to the 2012 CRS manual to be on the whole a welcomed and positive improvement both for our own efforts in floodplain management and also for the NFIP as a whole. The emphasis on the natural and beneficial functions of floodplains is in line with the direction we taken with our existing and future ordinances. FEMA's increased recognition of the benefits of preserving these natural and beneficial functions will provide us with another crucial piece of evidence when defending the strict environmental and floodplain management policies we are committed to. While some of the new prerequisites and metrics proposed may increase the workload on city staff we recognize the value that collecting and having this data can provide to both us and to FEMA." | Southwestern City #1 |
| | Allow comments to be submitted after the points are publicized. "...citing percentages rather than actual credit numbers, makes it impossible to realistically assess the impact of the proposed changes." | Southern County #1 Southern User Group #2 State Association #1 |
| | It looks like there are more credits to communities with higher risks, like coastal areas. | Southern County #3 |
| | There are advantages to having a county work on behalf of its cities. | Southern County #4 |
| | One driving force for the changes is to bring in more money to the NFIP. Since South Florida communities have a big impact on the program, they will be harder hit. <i>[A response to this statement was sent back to the users group.]</i> | Southern User Group #1 |
| | It seems with the new CRS manual focusing on getting more PRP policies, it would be nice if a CRS credit was given to PRP policies. | Southern City #4 |
| | If the Manual changes means a loss of class, have it take effect at the second cycle visit. "Given that the 2012 changes have not yet been finalized, and are coming so late in the year, we suggest that these changes should be made effective in 2013, and give everyone a year to evaluate the impact on their programs and make adjustments as necessary before the changes take effect." | Midwestern County #2 State Association #2 |
| | "The CRS program seems to be moving toward a more planning-based approach. While I think this is a good idea in theory and plans are great if they're put to use, I worry that most plans will sit on a shelf and collect dust." | Consultant #1 |
| 211 | Prerequisites | |
| | Make sure new prerequisites are reasonable and can be met by those communities in the affected classes | Southern County #1 |
| Insurance | Cost of required flood insurance seems reasonable. Communities should inventory their own buildings and needs. | Southern County #6 |
| Insurance | The cost of required flood insurance could range from \$38,000 to \$30,000,000, depending on the size of the community | Southern User Group #1 |
| Insurance | Don't specify how the insurance requirement has to be met. Let the community decide how it will cover the cost of flood losses as long as it knows it won't get FEMA disaster assistance. | Southern County #5 |
| Insurance | Some communities do not self-insure in the manner described. This will be a budgeting issue. | State Association #2 |

| Section Element | Comment | Source |
|-----------------|--|---|
| Insurance | "It is not a requirement that EVERY structure in the floodplain have insurance to score points so why the high bar for the community? The task force must recognize that in many communities the advocates for good floodplain management are not always in charge of the community's purse strings and setting the priorities for the whole community. That doesn't mean that a community can't have an effective floodplain management program..." | Western County #3 - 2 |
| Insurance | "either the requirements to have insurance are not good enough ... or this is a way to mandate the selling of more NFIP policies regardless of if they are required or not. Both are bad messages and prohibitions to increased participation." | Southwestern County #1 |
| BCEGS | A community can have acceptable criteria for floodplain development, but won't get the needed BCEGS class unless it's also enforced outside the floodplain. | Southern City #4 |
| BCEGS | Don't require the BCEGS prerequisite if the community has such restrictive floodplain management regulations that little will be built in the SFHA | State Association #1 |
| BCEGS | BCEGS and the International Codes are not related to, and can be contrary to, good floodplain management. Only apply the existing prerequisite when a community want to improve a class. <i>There are two pages of details that the BCEGS Committee has.</i> | Midwestern City #4 |
| BCEGS | "If the CRS was developed as a holistic view of the cumulative effect of activities that reduce flood risk then it is imperative we continue to make it about flood protection activities.... This prerequisite unfortunately discounts the great effort our County makes towards assisting the NFIP CRS program in reaching its goals..." | Southwestern County #1 |
| BCEGS | Consider grandfathering communities that meet the current prerequisite. | State Association #2 |
| 214 | Recertification | |
| Data Table | It will be difficult to supply all the data needed for the new recertification form, especially for large communities and counties. | Mid-Atlantic County #1 Midwestern County #1 Southern City #7 Western City #4 |
| Data Table | Data in the hazard mitigation plan [offered as a source of data for the table] is an estimate and the number is only updated every 5 years with the plan. | Western County #4 |
| Data Table | Errors were found in the table example – OK | Western County #1 |
| Data Table | How much detail/accuracy is needed on the new form? – OK | Southern County #2 |
| Data Table | The new requirements should not be a problem because the community does not have that much activity in the floodplain | Southwestern City #3 Southern City #3 |
| Data Table | FEMA should officially drop the biennial report and just require the proposed recertification data form. | Southern City #5 |
| Data Table | It would take a few days to filter through the data but it's accomplishable. | Southern City #6 |
| Data Table | How does completing the table improve floodplain management? "The report appears to be data compilation for its own sake." | Western City #4 Southern City #7 |
| Data Table | The reporting period is unclear – OK FEMA is a better source of info on LOMAs and LOMRs. | Western City #4 |

| Section Element | Comment | Source |
|------------------------|---|---|
| 230 | Verification | |
| Visits | Base the frequency of verification visits on claims as well as class and size of discount | Southern City #1-2 Western County #1 |
| Visits | Don't single out large communities that save the program a lot of money | Southern User Group #1 |
| Visits | It makes sense to visit higher discount communities more often | State Association #1 |
| | Changing the pass/fail threshold for Elevation Certificates from 80% to 90% seems arbitrary | Southern User Group #1 |
| | Looks like more rather than less documentation | Southwestern State #1 |
| 310 | Elevation Certificates | |
| | Need to clarify why a V Zone Certificate will be needed – OK | Midwestern City #2 |
| | Update the website that shows how to fill out an EC correctly – OK | Mid-Atlantic City #1 |
| ECCF | OK to eliminate the ISO Elevation Certificate software, but keep the credit for computerized records. More efficient record keeping frees up floodplain managers' time for other work. Will also support the new SDE software. Can be incorporated into GIS to identify planning and mitigation needs. Serves as backup to paper copies. | Midwestern State #2 Southwestern County #2 State Association #1 |
| Recertification | Submitting more Elevation Certificates at recertification will be very time consuming. "will require the City to scan, catalog, and purchase additional hardware and software....it is a major undertaking for large municipalities ... whose municipal boundaries are almost entirely within a floodplain." | Southern User Group #2 Southern City #7 |
| 320 | Map Information Service | |
| | Don't reduce the credit for providing information from FIRMs. Community gets a lot of calls for this service. Don't reduce credit just because it's easier to get the information elsewhere. "It is important the Task Force recognize the value of having a local official put a face to the flood insurance program, as these direct contacts with residents are some of the best ways for officials to discuss the benefits of the NFIP." | Midwestern City #3 Southern User Group #2 State Association #2 |
| | Don't reduce the credit for providing information from FIRMs. FIRMs are not that easy to read and people, including insurance agents, need help and many call. | Southern City #1 |
| Publicity | Provide partial credit for alternative publicity approaches | Midwestern County #2 State Association #2 |
| 330 | Outreach Projects | |
| | The score should favor the actual projects more than the committee process | State Association #1 |
| | Keep the current points and provide new credits for the new requirements. "The County would still be encouraged to expand its activities to receive additional CRS credit." | Western County #2 |

| Section Element | Comment | Source |
|-----------------|--|--|
| | Like the move to allow communities to target their audiences and needs. This helps large communities that cannot do mailings to all residents. | State Association #1 Midwestern County #2 State Association #2 |
| OP | The scoring for targeted outreach projects may encourage communities to select small, insignificant populations that are easy to reach. | Southern City #1 - 2 |
| OP | Comments on what projects are effective and how they should be scored: E-mail projects are less effective than regular mail and should be scored differently How do you measure a YouTube clip that could go viral? | Southern City #1 - 2 Western County #3 - 2 |
| PPI | The cost of a Program for Public Information (PPI) will be a cost to the community, which may need to hire a consultant. | Southern County #5 |
| PPI | The proposed changes are so complicated and will take so much work, many communities will drop the credit | Southern County #1 Mid-Atlantic City #1 Southern County #5 |
| PPI | While the CRS desires to allow flexibility and locally-designed programs, this effort is defeated by the specificity of how the PPI Committee has to be organized. | Western County #3 - 2 |
| PPI | There are too many credits in too many activities based on a PPI. “The scoring is much too complex. It will be difficult to judge the value of the program that has so many multipliers, prerequisites and mandatory messages, linkages to other activities...” | Western County #3 - 2 |
| PPI | It's hard to get committees together. Too many points are tied to the PPI. | Midwestern City #1 |
| PPI | Why are stakeholders more capable of designing a good PPI than the professionals who work for the community? | Western County #3 - 2 |
| PPI | A committee with outside stakeholders is outside the authority of the local government. | Southern City #7 |
| PPI | Why the requirement for a government activity to have 50% membership outside the government? It's hard to get non-governmental people to participate. Consider alternatives: a staff-prepared plan that is vetted through a committee, such as a zoning board, or documentation that stakeholders were invited. | Southwestern State #1 Western County #3 - 1 |
| PPI | Not clear how detailed the assessment and PPI document need to be – OK. | Southern County #5 |
| PPI | Clarify how a multi-jurisdictional PPI committee would qualify. – OK Use the CRS users group to get a regional PPI – OK | State Association #2 Southern City #3 |
| PPI | Clarify how a large community can adopt the PPI document by reference – OK | Western County #3 - 1 |
| STK | Consider elected officials as stakeholders (STK). They are independent of the local government regulating office. | Midwestern County #2 State Association #2 |

| Section Element | Comment | Source |
|------------------------|--|---|
| STK | Some messages are better delivered by the local government. Let the PPI determine which ones are appropriate for stakeholders and give them full credit. | Western County #3 - 1 Western County #3 - 2 |
| ACT | It will be too hard to measure results to get dependable action (ACT) credit. Many results will occur for reasons not related to the outreach projects, the timing of changes may not coincide with cycle visits, very important projects may be redesigned in order to get measurable (but not as effective) results. | Southern City #1 - 1 Southern City #1 - 2 Southern User Group #2 Southwestern State #1 Southern City #7 |
| ACT | If a community has been doing a good job all along, it would be harder to show improvements and get good outcome scores. | Southern County #3 |
| 340 | Hazard Disclosure | |
| | Clarify role of real estate agents for PPI bonus credits – OK | Southern City #1-1 |
| DFH | Don't drop the 20 points credit for a state disclosure law. | Western County #4 |
| REB | Provide the extra credit if real estate agents were involved in the preparations, regardless of whether there is a PPI committee. | Western County #3 - 2 |
| | "This is a very difficult activity to monitor and enforce." | Southern User Group #2 Western County #3 - 2 |
| 350 | Flood Protection Information | |
| WEB | All communities in a county should get credit for the county's website (WEB). | Southern User Group #2 |
| WEB | "The proposed monthly [website] updates are unrealistic and an unreasonable and unnecessary imposition on staff. It is updated whenever changes warrant." | Southern User Group #2 |
| WEB | Clarify whether stating an Elevation Certificate is available is sufficient for credit (rather than posting the entire certificate on the site) | State Association #1 |
| 360 | Flood Protection Assistance | |
| Publicity | Provide partial credit for alternative publicity approaches | Midwestern County #2 |
| 370 | Flood Insurance Promotion | |
| | Clarify role of insurance agents and lenders in a government program. Need to avoid conflicts of interest or a government agency recommending private insurance agencies or companies – OK | Southern City #1 - 1 Western County #1 Southern County #5 Southwestern State #1 Southern City #7 |
| | "We should not be held accountable for anything beyond informing the public of the benefits of insurance, mitigation, etc., not be held responsible for, rewarded for or penalized for the purchase decisions of residents or how many policies NFIP sells." | Southern User Group #2 |

| Section Element | Comment | Source |
|-----------------|---|--|
| | The cost of this activity will deter communities from applying for it. | Southern City #5 |
| | Note that insurance data provided by FEMA through ISO has lots of errors in the location and community ID number. | Western County #3 - 2 |
| | Clarify the level of technical assistance that is to be provided. – OK | Western County #3 - 1 |
| | Flood insurance coverage is determined by outside factors, such as foreclosures | Southern City #7 |
| | Don't bother elected officials with the details of a flood insurance coverage plan. | Western County #3 - 2 |
| | Insurance policies don't show how many structures are affected, so it would be impossible to compare number of policies with number of buildings in the SFHA. | Western County #3 - 2 |
| 402 | Impact Adjustments | |
| | Loss of the default impact adjustment for open space preservation is a concern | Southern User Group #2 |
| 420 | Open Space Preservation | |
| | Increasing the credit for open space won't help communities that are already built out. They will lose points in other activities without a compensating increase here. | Southern User Group #1 Southern City #1 - 2 |
| OS | Provide credit for open space (OS) purchased by a community that is located in another community. Provide credit when the projects outside the community are in the watershed draining into the community and are for water quality purposes | Southwestern State #1 Southwestern City #1 |
| NFOS | Provide natural functions open space credit (NFOS) for greenbelts and wildlife corridors that are connected to floodplain open space but are not located in the floodplain. | Western City #3 |
| NFOS | What's the relation between protecting endangered species and running a good floodplain management program? | Western County #1 |
| NFOS | This credit runs contrary to the need to take active measures to preserve beaches that protect property. "Without intervention, shoreline communities will be at greater risk for flooding." | Southern User Group #2 |
| NFOS | Documentation of the natural floodplain functions for each parcel in a large community can be burdensome. | Midwestern County #2 |
| OSI, LZ | Low density zoning (LZ) encourages sprawl. Open space incentives (OSI) do not and should be given more credit than LZ. | State Association #1 |
| 430 | Higher Regulatory Standards | |
| | Broaden the scope to include more NAI-type approaches | State Association #1 |
| DL | DL credits prohibiting fill (DL1), buildings (DL2), and storage of materials (DL3). Such restrictive regulations are unfeasible where most of the community is in the floodplain. | Southern City #7 |
| DL1 | Don't prohibit fill (DL1). Fill has worked effectively for decades to protect insurable buildings. | Southern User Group #2 |
| DL1 | Adjust the credit to treat prohibiting fill differently in riverine vs. coastal areas. | Southern City #1 - 2 |
| DL1 | In areas with developed lots already filled, new buildings should be built on fill to prevent local drainage problems. | Southern City #1 - 2 |
| DL2 | Make sure that prohibiting buildings (DL2) is worth more points than freeboard and other regulations that allow buildings in the floodplain | State Association #1 |

| Section Element | Comment | Source |
|------------------------|--|--|
| FRB | Don't reduce credit for the first foot of freeboard (FRB). It's hard to get higher freeboard, the first foot is important due to flood fringe encroachment. Don't base the credit reduction on something being the national norm if it's still higher than the minimum NFIP requirement. Base the credit on the amount of price break in the rating tables. | Midwestern State #2 State Association #1 |
| FRB | The credit for freeboard should be related to the amount of freeboard actually needed. In areas subject to shallow flooding, one or two feet can provide all the protection that may be needed. | Southwestern County #2 State Association #1 |
| RA | The cost of this new element, regulations administration (RA), will deter communities from applying for it. | Southern City #5 |
| 440 | Flood Data Maintenance | |
| AMD | Some layers credited for additional map data (AMD), such as tax records are only available at the county level. [Note that cities can get this credit if staff have access to it.] | State Association #1 |
| 450 | Stormwater Management | |
| SMR | Reducing the volume of runoff isn't always good stormwater management regulations (SMR). Runoff can be used to create habitat in desert areas. It may also be contrary to Western water law that restricts the ability to retain water. | Western County #1 State Association #2 |
| SMR | Be flexible when reviewing how different communities manage the volume of stormwater runoff | Midwestern County #2 |
| 510 | Floodplain Management Planning | |
| RLAA | Repetitive loss area analyses (RLAA): The \$1,000 threshold for determining repetitive loss properties means that there will always be some properties that need to be addressed. Many of the solutions depend on property owner mitigation actions that they many not take or that don't meet the benefit/cost criteria for a grant. Therefore, there will be lots of annual reports showing no progress while more repetitive loss properties are added to the list. | Midwestern City #1 |
| 520 | Acquisition and Relocation | |
| | Acquisition is very effective and should not have reduced credit. "...acquisition and relocation is one of the best, most permanent ways to mitigate flood losses. Why would you now put less emphasis on this?" | Midwestern County #2 State Association #2 |
| 520 and 530 | Don't reduce credit based on the FEMA cost share. The end result is the same, "complete mitigation of a flood prone property and decreased burden on the NFIP." There's a lot of work to leveraging local funds and implementing the projects. | Southwestern City #1 |
| 620 | Levees | |
| 620 | The proposed change will help the community with a non-accredited levee | Western City #2 |
| 630 | Dams | |
| | Dam break inundation maps can be classified in some areas, making it difficult for local use and for CRS documentation | State Association #1 |
| | Available dam failure inundation maps don't necessarily accurately identify who could be affected. | Southwestern State #1 |
| SDS | State dam safety (SDS) credit will be provided only to those communities that are affected by an upstream dam. Clarify what determines if a community is affected by an upstream dam failure. Would a worst-case scenario be creditable? | Southern User Group #2 |

| Section Element | Comment | Source |
|-----------------|--|------------------------|
| SDS | "The removal of ... credits on activities such as dam safety will cause unavoidable class changes because of no fault of the community. This will be hard to explain to local officials critical to support of the program." | Southern User Group #2 |
| SDS | The state dam safety program is very important and deserves more credit. | Southwestern State #1 |
| LFO | The requirement for monthly communication checks is too burdensome. Recommend annual communication checks. | Southwestern State #1 |
| | Special Hazards | |
| 410SH 440SH | Consider data maintenance credits as an alternative to the regulations prerequisite for mapping credit | Southern State #1 |
| 420SH | Technical comments on the open space impact adjustment to account for local variations | Southern State #1 |
| 410SH 430SH | Provide additional credit for mapping and managing non-beachfront shorelines | Southern State #1 |

Commenting Communities and Organizations

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Midwestern City #1

August 30, 2011

Your Questions or Comments

Activity 330 – Outreach Projects, PPI

1. PPI- it would seem this would be a disadvantage to us and other communities as it reduces the credited points for the outreach project activities if the PPI is not established (only a percentage of the maximum points is awarded). The establishment of a PPI committee sometimes is difficult to do as it is hard to recruit volunteer members outside the local government for their to participation. Also, if there is business at hand to be discussed, it is sometimes hard to fit all the member schedules to meet. As this PPI committee sets the points for the other CRS activities raises this serious concern.

2. **Activity 340/Hazard Disclosure-** Why drop the State Disclosure Law? It was tried before asking the real estate agencies to include the floodplain information for the property they are listing but it was not happening. Also try telling them that their brochures had to be approved by a PPI committee. This means then that we get no points for this activity.

French's note: The credit for state disclosure law would be dropped from DFH (20 points), but still kept as creditable under ODR (5 points). This change is because upon closer review during the UMC work, we concluded that no state deserved the 20 points. This state was never one of them. The brochure credit can still be obtained without a PPI, it just won't get as many points.

3. **Activity 510/Floodplain Management Planning-** The concern here is with the repetitive Loss Properties (RLPs). While we try to emphasize in our outreach projects the need to buy flood insurance, the insured will use this to apply and pursue flood loss claims. In doing so, after 2-claims of more than \$1,000, they become RLPs and we become an RLP community (some of the RLPs are not even in the floodplain). Even if you try to mitigate 1-property, there will be 2 or 3 properties replacing this mitigated property due to the above and the community will always be a RLP community. In performing the RLAA using the National Flood Mitigation Data Collection Tool, most of these RLPs doesn't reach the mitigation cost/benefit threshold due to the low amount of claims. Also, preparing an annual report with the repetitive problems and repetitive solutions due to non-implementation of the resident (e.g., sump failure/sanitary back-up) is kind of redundant year after year (possibly a waste of paper too) and a disadvantage to the image of the community because it would seem to show that the community is not doing enough to help the RLP area. Also, most of the RLP area tend to show similar problems and solutions. If the \$1,000/claim is still the threshold for RLP, the community will never win the mitigation battle and will be cranking the same report annually.

Southwestern City #1

August 31, 2011

Your Questions or Comments

General

We at the City find the proposed changes to the 2012 CRS manual to be on the whole a welcomed and positive improvement both for our own efforts in floodplain management and also for the NFIP as a whole. The emphasis on the natural and beneficial functions of floodplains is in line with the direction we taken with our existing and future ordinances. FEMA's increased recognition of the benefits of preserving these natural and beneficial functions will provide us with another crucial piece of evidence when defending the strict environmental and floodplain management policies we are committed to. While some of the new prerequisites and metrics proposed may increase the workload on city staff we recognize the value that collecting and having this data can provide to both us and to FEMA. In attending both the webinars and reading the documents available on the CRS2012 website there were however a few proposed changes with which we disagree.

Activity 520 – Acquisition and Relocation and Activity 530 – Flood Protection

The first proposed change that we question is noted on page 25 of the overview of proposed changes dated 7/21/11 regarding activities 520 and 530. The note states, "There may be a reduction in 520 and 530 credit for projects that used FEMA funds. For example, if a property was purchased with funds from a FEMA mitigation grant with a 75% cost-share, the community may get only one-half the full credit. This has not yet been decided." The goals of CRS are to recognize, encourage and reward, by use of flood insurance premium adjustments, community and state activities beyond the minimum requirement of the NFIP, including those that reduce flood damage to insurable property. In our opinion this proposed change may be counterproductive to that goal. Whether a property is purchased partially with FEMA money or not doesn't change the end result – complete mitigation of a flood prone property and decreased burden on the NFIP. Communities that make successful attempts to leverage their tax-payers' dollars with federal money that is earmarked for flood mitigation activities should be recognized just the same as communities that fund their buyouts solely through their own tax base. In addition, the work and effort required to carry out buyout projects that are partially FEMA funded is the same, if not more, than the work and effort required to carry out buyout projects that are 100% locally funded. A great deal of work goes into preparing grant applications, ensuring compliance with federal regulations, additional reporting requirements to FEMA, and project close out and financial auditing.

Decreasing the recognition CRS provides to communities for managing these grant funds could force communities to reevaluate cost/benefit factor in staff time and resources spent on these grants and could ultimately lead to mitigation projects of small scope perhaps leaving more properties subject to flooding, which results in a continued burden on the NFIP.

Activity 420 – Open Space Preservation

The other issue of concern to us regards activity 420. A question we raised during the webinar specifically covering natural and beneficial functions related to crediting open spaces preserved by a community outside of their jurisdiction. We have in the past and continue to use bond funds and funds from development fees to purchase water quality protection lands outside of our city limits. The lands are located within the upper reaches of watersheds that flow through our community. These preserved open spaces are purchased for the intent of protecting recharge features critical to the Edwards Aquifer, and to offset development and impervious cover downstream. It is our opinion that land that a community purchases with the intent of protecting open space and water quality within a watershed know to be a source of flooding in the community should be credited under activity 420 regardless of whether the preserved open space falls within said communities corporate limits.

Southwestern City #1 – page 2

Thank you for your consideration on these matters we look forward to implementing the new manual and continuing to work with FEMA to achieve a higher level of floodplain management in our community.

Consultant #1

August 31, 2011

Your Questions or Comments

General

The CRS program seems to be moving toward a more planning-based approach. While I think this is a good idea in theory and plans are great if they're put to use, I worry that most plans will sit on a shelf and collect dust. I see more benefit to activities such as freeboard, which I believe should be credited higher than it currently is. Most communities do have a freeboard; however, it is still considered a higher standard and that should not be dismissed. Freeboard is one of those activities that directly correlates to reduced flood damages which is one of the main goals of the CRS. A community with homes built two feet above BFE is going to manage better in a disaster than one with a comprehensive plan in a binder that is tucked away on someone's office shelf. Increasing the freeboard also means an ordinance revision followed by an item on the council agenda for approval and the enforcement to back it up. Writing plans can sometimes take a significant amount of time and resources that communities in the current economy simply do not have. My suggestion is to give more consideration to raising the credit for freeboard and other activities that have a tangible effect on the NFIP and that speak directly to the three goals of the CRS program.

Southeastern City #1

August 11, 2011

Your Questions or Comments

230 Verification I fully understand why you are changing the audit visits from 5 to 3 years for communities with the highest savings; however, I would recommend doing the same for communities that have a higher number of claims and higher claim dollar amounts. We are 9th in the country in citizens savings, but we also have a very small number of claims (700+/-) and only 103 of the claims were paid. This is due to our outstanding stormwater maintenance program, in addition to well written and enforce regulations. We're fortunate that our Council and management take the CRS program very seriously. With that said, there are various items that concern me with the proposed changes.

Activity 330 – Outreach Projects:

I'm gravely concerned about the ACT portion of this section. I don't feel the messages are as measurable as thought. I looked at Table 4, on Page 8 of the "Proposed Changes to CRS Activity 330 Out Reach Projects", which shows sample messages and their desired outcome.

- If we have a "buy flood insurance" message, then the message outcome for this item is more people have flood policies. I'm not sure if this would be a valid way of determining if our message is working. With the downturn in the economy, people who own their homes are dropping their policies. In addition, new homes are built annually, which means we should have more policies without promoting insurance. Again, I'm having trouble figuring out the best way to measure this message.
- The last message in this table is "Know your evacuation route and have a family rendezvous point. The Message Outcome for this item is "More families have prepared evacuation plans". How would we know if more families have evacuation plans?

Activity 340 – Hazard Disclosure:

- DFH says real estate agents need to be represented on PPI committee, but REB says "As with DFH, full credit is only provided if the brochure was reviewed by the PPI committee." This leaves me unsure if we need real estate agents on the committee or just committee review.
- As a government entity, we are not allowed to refer people to businesses in the community. It is considered a conflict of interest. If we need an agent on the committee, then the agent will want to put their logo and contact info on the brochures and other agencies will claim wrong doing on the City's part. Without the advertising, we'll run into agents wondering why they should waste their time on the committee.

Activity 370 – Flood Insurance Promotion:

I have the same concern as I do with Activity 340; conflict of interest by inviting a local insurance agent and local lender to be on the committee.

Southeastern City #1 – 2nd Submission

August 21, 2011

Comprehensive Planning Team Coordinator

It is obvious that the current CRS manual was carefully evaluated and proposals for the update have been crafted to further the purpose of the program. During a period of economic turmoil and widespread clamoring for reductions in government, the major changes proposed will require many hours of staff time. We are more than willing to cooperate if the program is truly improved and more equitable; however, I think there are several modifications that should be considered prior to finalizing, as follows:

I recommend that you strongly consider abandoning the proposal under **Activity 330 for ACT—Action Results** credit. Although on casual consideration it might seem logical to provide an optional bonus credit for successful advertising, several factors would make such a program inequitable and problematic.

First and foremost, it could be difficult to really measure the success of the outreach message. Consider the two examples provided in the *Changes to Activity 330* document. One is to increase the number of flood insurance policies. The number of policies purchased during any given year is likely dependent on numerous factors other than the advertising. Factors such as general economic conditions, flood insurance rates, rate of institutional ownership, and the rate of mortgage refinancing could all have a much greater effect on the number of flood insurance policies than the activity 330 advertising. It is possible that a 330 activity was highly successful at dissuading policy cancellations, yet that would not be measurable. Conversely, a 330 activity could be poorly crafted and ineffective, yet statistics could indicate that the number of policies increased as a result of ownership transfers, scary news about flood damage elsewhere, or generally good economic conditions.

The other example in the *Changes to Activity 330* document relate to stream and ditch dumping. There could be many reasons why maintenance workers collect 2 less truckloads of debris—completely unrelated to the 330 outreach program. It could be that the high winds that blew debris in off trees, trucks, or garbage receptacles did not occur the next year. It could be that the maintenance workers were less diligent or that the debris sank or decomposed. If the maintenance workers did a better job the next year, that would actually penalize the community if they had more truckloads.

Secondly, there would be a timing problem of the PPI committee as it relates to the recertification timing and the verification visits.

Finally, there may be some types of outreach projects that could be easier to show success on than others, yet are less beneficial overall. Projects involving flood safety may be particularly beneficial in protecting human life, yet may be the most difficult to prove. Even activities that involve saving money for the flood insurance program, such as a message to move valuables to upper shelves or upper floors may be virtually impossible to measure.

The **Targeted Outreach** concept makes sense if the targeted audience is a significant population, such as the floodplain's property owners. It makes less sense where the targeted audience comprises a small segment of the population. One example in the *Changes to Activity 330* document identifies the targeted audience as students learning to drive. This is likely to be a miniscule percentage of the population, many of whom may live in their parents' homes; therefore, the effectiveness of such a program would probably be similarly small. If the yet-to-be-finalized point system provides an adjustment, this could negate this shortcoming.

Another concern with the Targeted Outreach is the apparent willingness to accept e-mail messages. E-mail is very attractive because it is cheap; however, it would be impossible to verify the geographic location of e-mail addresses, and furthermore, e-mail addresses are subject to change and may be less effective due to spam blockers. Moreover, it is unlikely that e-mail messages would have the same effectiveness as a mailed paper piece. Some public records/privacy issues may also be involved. Therefore, if e-mail addressed outreach is accepted, it should be credited with less weight than outreach that is physically mailed to an address.

The proposal appears to give a huge credit for **DL Development limitations**. Fifty percent of that is prohibiting fill. The placement of fill is likely to have a far greater detrimental effect in an area subject to riverine flooding than an area subject to coastal flooding from storm surge. Therefore, consideration should be given to have such discouragement apply to floodways rather than the entire floodplain.

Another consideration is the effect on infill development—something planners generally agree should be encouraged. Within a neighborhood where most of the homes have been placed on fill already, new regulations prohibiting fill would deter development of vacant properties. It is understood that there could be countervailing interests for or against such infill development; but this disregards the investment in infrastructure that communities have already made. For anything but new communities that are likely contributing to urban sprawl, establishing a new prohibition on fill would probably result in almost all of the existing structures becoming non-conforming. The flood protection benefits of any such regulation in an existing community where fill had previously been allowed may take decades or even centuries to realize. *French's note: it is not our intention to make existing fill a nonconforming use. It is new filling that the element seeks to prohibit.*

Moreover, in some communities the hydrologic studies for the FIS and FIRM have already taken into account fill that has already been placed on building sites/home pads. *French's note: it is not our intention to make existing fill a nonconforming use. It is new filling that the element seeks to prohibit.*

Activity 420 – Open Space Preservation The credit for prohibition on new buildings has similar implications for discouraging infill development and encouraging urban sprawl. Furthermore, such a proposal for encouraging the prohibition of any building is the epitome of ignoring the financial and legal implications of implementation. If the local government prohibits building construction on a parcel within the SFHA the government must compensate the landowner. The likelihood that a local government could do this is highest where the community is nearly built out and therefore prohibiting new construction has almost no effect—and therefore, where the benefit to the NFIP is similarly negligible.

Please feel free to contact me if you have any questions.

Mid-Atlantic County #1

August 1, 2011

Your Questions or Comments

Comment:

214 – Recertification

Our community would have a problem supplying data for the Proposed Annual Recertification Data Table. Our community does not require a permit for structures under 200 square feet and does not track demolitions (only home replacements). It would be challenging for our community to change policies to begin gathering this information in time for annual recertification next year.

Southern County #1

August 29, 2011

Your Questions or Comments

As a **general comment**, I think it is premature to close out a comment period prior to the Task Force determining the actual credit points that will be available for activities after the proposed changes take effect. Communities do not yet know based on the information that has been provided whether or not they will lose (or gain) credit under the changed schedule, so it is difficult to comment on the proposed changes.

Another general comment, **Activity 330** has been made much too complicated for communities and ISO specialists to navigate without investing a great deal of effort. This is one of the more important activities for engaging residents in taking steps to protect their own property, yet the proposed revisions make it so complicated that many communities will likely give up their outreach programs due to the lack of resources to keep the applicable records for scoring purposes.

211 – Prerequisites Lastly, any changes that affect a prerequisite for a class rating need to be fully evaluated to determine that these are reasonable and can be met by communities that currently hold these class designations. I would encourage FEMA/ISO to have another comment period after the actual amount of credit to be available for each activity has been determined to gather feedback from the communities on the proposed changes prior to making these "final".
Thanks!

Western County #1

August 3, 2011

Responses below from:

French Wetmore, CFM
French & Associates, Ltd.
2601 Havelock Court
Steilacoom, WA 98388

Since the proposed changes are not official yet our community does not have a lot of extra time/manpower to spend on review. I would like to share a few things I noticed during your presentation. Also I would like to thank you for the presentation, the information, and the time you spent informing us of the changes.

214 – Recertification Page 7, of the presentation, has a table. Item 15 of the table says (sum lines 11-13). Item 11 is a number and items 12 and 13 are acreages, so a sum of these won't work. maybe it is referring to the excel spreadsheet rows. At first I thought it said sum 11 minus 13, which was confusing. Maybe it should say (SUM items 12 to 14). I know all of this isn't critical, but it was confusing.

French's response: Thanks for catching this: it's a goof. We didn't keep the numbering updated when we added a couple of new rows.

Page 14.

Activity 370 – Flood Insurance Promotion Our community is not in the flood insurance business. We focus more on protection or removal from flood zone. We do encourage people to buy flood insurance, but I guess I am not sure how this really should be part of determining how we as a community are regulating our floodplain. I realize the NFIP is supposed to be self funded, but at our expense?

French's response: This is a voluntary activity. See the attached article in the ASFPM News & Views on why local governments should promote flood insurance as an additional flood protection measure for their residents.

I realize the EPA has their regulations embedded in every faction of the government and that we all should be environmentally conscious. I also realize the environment can play an important role in flood mitigation.

Page 16, number 3

Activity 420 – Open Space Preservation Is there really any connection between endangered species and the effectiveness of a flood control/mitigation feature. If I have a detention basin that is completely barren and has no sign of wildlife or vegetation in it, it will still function to reduce the peak flow. Why should it be less valuable to a desert community than a wetlands area is to a coastline/wet community.

French's response: The new Goal 3 increases the attention to protecting natural floodplain functions for both the flood protection benefits and the environmental benefits. The credit for a property in open space is not proposed to be reduced and will likely be increased. If the property has additional benefits related to natural floodplain functions, even more credit is available. The detention basin example you give will get the appropriate flood protection credit. If it has natural functions benefits, it could get more credit.

Activity 450 – Stormwater Management

Page 21, Volume of Runoff

This is another example of the EPA trying to apply their wet area regulations into a "one size fits all" rule across the U.S. We live in a desert. Runoff is an asset, not a liability. We have such an adverse environment that sometimes development actually decreases runoff, which can be a bad thing. We have actually seen water rights filed on excess runoff. The State Department of Wildlife creates impervious areas to collect rainwater for wildlife. We mitigate our runoff and erosion by providing erosion protection. In many areas development has mitigated many long term erosion problems. So I guess all I am saying is please don't penalize us for increased volume of runoff. Allow us to show how we mitigate this and how it adds to our scarce water supply.

French's response: The watershed management plan credit (WMP) in Activity 450 provides additional points for communities that can demonstrate what you describe. It is the opposite of a one size fits all approach.

230 – Verification

Page 26

I was confused when you explained about the communities with just a few policies and how they might not warrant as much attention as a community with numerous policies. It really seems the basis should be the annual number of claims and the number of repetitive claims. This would be a more sound cost accounting principal. A community with many policies and few claims is a much larger benefit to the NFIP than a community with a few policies and few claims. Maybe the accounting, CAV, rating, system could be based on the claims payment to premium payments ratio of a community. The smaller the historic ratio (few claims/many policies) the more benefit the community is to the NFIP. The larger the historic ratio (more claims/fewer policies) the more of a burden the community is to the NFIP.

French's response: That's an interesting point that we will consider when we develop the verification visit criteria. Meanwhile that annual dollar difference due to the savings looks like a pretty important factor, too. It's something occurring every year. Note that the basis for a CRS visit is not the same as a basis for a CAV.

Southern County #2

August 25, 2011

Your Questions or Comments

214 – Recertification

We are wondering whether or not we must provide the total acreage in our county of property in the SFHA. If so, that will be a very labor intensive process, since we'll need to do it parcel by parcel for accuracy.

French's Response: We do not envision the level of accuracy you propose. If you have access to GIS, the system should have an SFHA layer that could calculate total acreage or square miles. If you don't have a county GIS, some states and regional planning agencies have the ability to provide GIS support for this type of data.

State Association #1

August 30, 2011

Attached you will find a letter and comments from the CRS Committee of the State Association of Stormwater and Floodplain Managers. On behalf of the committee, I would like to extend our appreciation to you and the Task Force for providing us with the opportunity to comment on the proposed changes. We appreciate the detailed explanations of the proposed changes via the webinars and the documentation on the website. This information was also helpful to us in understanding the reasoning behind the changes.

If you or the Task Force have any questions or need clarification on the submitted comments, please feel free to contact me.

Sincerely,

State Association of Stormwater and Floodplain Managers

230 – Verification – Documentation Requirements

- There was hope this revision would make the CRS certification process less burdensome and complicated. Unfortunately, it seems the requested documentation and additional emphasis on committees is going to require even greater effort. It is our opinion this is a deterrent to recruiting new communities into the CRS and for existing communities to improve their CRS Class.

Procedures and Prerequisites

- We support the proposal to more frequent visits for communities with higher discount dollar amounts.
- The Quick Form will be a great benefit to encouraging new communities to join the CRS.

211 – Prerequisites

- There is concern about changing the BCEGS prerequisites for Class 7 or better and for Class 4 or better. It is suggested the BCEGS prerequisite requirements remain the same.
- Consideration should be given to allow the BCEGS prerequisite for Class 7 to be “over-ridden” if the community has adopted a no development and no fill in the floodplain regulation and is receiving a certain number of points under 420 OSI and 430 DL. If a community does not allow development in the floodplain, then the BCEGS issues are of less importance. This would allow for a more flexible standard for being able to achieve a Class 7 or better.

General

- “Minimum Score” for Class 4 in Activity 610, 620, and 630 – No details have been published regarding the required points and in what categories under these activities. This “minimum score” needs to be more clearly defined, discussed, and comments solicited prior to adoption by the CRS Task Force.

Activity 310

- Computer Format – Credit for this activity should remain even if the database is not provided for by the CRS/FEMA. Having an electronic database at the local level provides for:
 - Being able to query data by year, address, property owner, etc., to more easily find records.
 - Institutionalized information
 - Easier transition for new staff
 - Improved customer service
 - Serves as a back-up to paper copies.

Activity 330

- PPI Committee Makeup - While the intent of increased public information is beneficial, we are challenged to understand why the makeup of the “PPI Committee” must include a high percentage of people outside of the local government. The PPI is a local agency responsibility and should remain there. We agree the local agency should look for ways to “market” the information so it is meaningful. This can be done through a Public Information Officer (PIO). An alternative to the PPI committee with outside stakeholders could be the outreach plan, as developed by staff, is vetted through a public board or commission made up of citizens and allows for citizen input, i.e., Flood Review Board, Planning and Zoning Board, etc. We would also like you to consider a CRS Committee or User’s Group could be used to help coordinate efforts among communities and offer similar benefits as the proposed PPI committee.
- Weighting – The actual outreach materials and the associated content should be given higher credit than any process such as the PPI.
- Attaining Desired Actions – This will be extremely difficult to quantify. Very specific metrics must be established. This will be hard to determine from year to year, may be influenced by many outside factors, and thus, not adequately measure the effectiveness of the outreach. It is suggested this be eliminated.
- We welcome the changes from a prescriptive type of outreach to a more targeted outreach based on specific community needs.

Activity 350

- Elevation Certificates on Website – Clarification is needed as to whether the complete certificate needs to be posted on-line or if it is sufficient to have a note saying they are available by contacting the local agency. Due to federally mandated privacy issues (Red Flag Act), posting the entire certificate may be problematic.

Activity 370

- Flood Insurance Promotion – Flood insurance is highly valued as a mitigation option. However, our membership feels that making citizens aware of the option and offering basic information is the appropriate role for local government. Further promotion is outside the appropriate role of local government. Local governments should not be “selling” something. Citizens will perceive this as a conflict of interest and may become even more skeptical of its usefulness. This activity should be scaled back.

Activity 420

- Open Space Preservation - The CRS does not recognize a community's investment in open space acquisition of lands in adjacent jurisdictions (such as an unincorporated county property adjacent to a city) that serve a significant benefit to the reduction of flood losses. Instead, the jurisdiction with no investment in the property acquisition, receives the CRS credits. Can there be a way to offer credit for these situations?
- Open Space Incentives vs. Low Density Zoning – Low Density Zoning encourages sprawl. A key issue in the West is encouraging “smart growth” by trying to reduce urban sprawl. Although the purpose of LZ is to try to minimize the amount of development in the floodplain, an argument can be made it is encouraging sprawl. The conflict between other credits, such as Open Space Incentives, further complicates this activity. Therefore, Open Space Incentives should be given higher weighting than Low Density Zoning.

Activity 430

- Freeboard – We are concerned about the potential lowering of credit for requiring 1 foot of freeboard. Although more communities are requiring freeboard, the CRS program is supposed to reward communities for going above and beyond the FEMA minimum standards. It should also be recognized the depth of flooding in areas across the country varies greatly. A community in our state that experiences 6 inches to 2 feet of flooding is very different than a community on the Mississippi River that experiences 6-10 feet of flooding. The amount of reasonable freeboard should be based on the average flood depth. Furthermore, it is the first foot of flooding with the highest losses and, therefore, should be more heavily weighted - not discounted.
- The State passed new statewide requirements in 2010 to require 1 foot of freeboard. This was a big step for many communities across the State. One of the selling points for the new regulations was the increased credit for the CRS program, and based on feedback received, this incentive worked. This is the obvious purpose of the basic existence of the CRS. Eliminating or reducing this incentive would not only negate the promise made to communities, but would also reverse this proven incentive. We strongly recommend the points for 1 foot of freeboard remain the same or even be increased. It is the State's position the first foot of freeboard is arguably the most important and effective higher standard that can be implemented, even in the absence of everything else. Unless 1 foot of freeboard is added to the NFIP's minimum regulations, it should remain to be considered a very important and effective higher regulation.
- No Adverse Impact (NAI) – NAI should be promoted in a more comprehensive manner. The concept of minimizing fill as proposed is important. However, mitigation of other adverse impacts is not being given credit. In addition to “extra credit” for compensatory storage, consideration should be given for analysis and mitigation of other issues. This could include minimizing higher velocities and, therefore, minimizing increased erosion, requiring dryland access, requiring emergency response/evacuation plans, notification of potentially impacted property owners, etc.
- Development Limitations – Some consideration should be given to the weighting of the points in DL relative to other 430 standards that overlap in their purpose. Ex. Prohibit New Buildings vs. Freeboard. If you have a regulation not allowing new buildings, then the freeboard is no longer relevant. Therefore, the points available for prohibiting new buildings should be higher than the points for freeboard.

Activity 440

- Flood Data Integrated into Tax Assessment Database for Additional Map Data – Because cities are not responsible for the tax assessment database, this will be an impossible criteria for a City to meet. Only at the County level is this possible. This topic should be eliminated and the weighting reallocated to the other attributes.

Activity 450

- Managing Volume - Requiring post-development volume to be controlled could cause a conflict with western water law, which restricts the ability to retain water. Some consideration to this is encouraged. One possible solution is to offer partial credit for controlling peak flows while not matching pre-development volume. Furthermore, some communities may determine that matching pre-development volume does not address an identified problem. *French's note: Dave and Cristina should investigate such alternatives.*
- Community Specific Approach - In addition, we believe communities should be allowed to use appropriate methods to show that post-development flows and/or volumes are addressed properly. For example, a community with very sandy soils will experience greater adverse impacts due to development. Conversely, communities with clay soils may be able to demonstrate that a lower level of mitigation will successfully offset similar levels of development. Similar examples can be made for channel and watershed slopes (steeper slopes will have greater impacts due to development), storm intensities (stronger storm intensities will have greater impacts due to development), watersheds that were historically partially developed and contain control structures (such as roadway embankments or dams), etc. A "one size fits all" documentation requirement could lead to problems due to the site specific variables that may be present. Flexibility is strongly encouraged to be given to communities to demonstrate how post-development impacts are mitigated. By allowing flexibility in how points are accrued under this activity, a more community-specific approach will be made. This would appear to be consistent with the new goals of the Community Rating System (see Activity 330, for example.) *French's note: Dave and Cristina should pursue this with the association. I believe what they're asking is already creditable under watershed management plan (WMP).*

Activity 630

- Dam Break Inundation Mapping – Because of national security issues surrounding dams, the inundation mapping is highly confidential. Obtaining this information is not easy. There may only be one local official (i.e. Emergency Manager) that has access to this information. The required documentation for this activity must take this into account. Copies of the inundation maps or certain data from the maps cannot be required to be submitted for credit.
- Downstream of a Dam - It also must be clearly stated what is meant by "being downstream and affected by upstream dams". While the obvious scenario involves communities directly in dam break delineations, we anticipate communities far downstream may also expect to receive credit. Downstream inundation can be difficult to explicitly define. Where the mapping stops is not necessarily where you may see the end of the impact. For example, if a dam fails on a tributary that flows into a receiving river already at flood stage, then downstream communities not explicitly identified as being in the hazard zone may nonetheless experience tangible adverse consequences, and it may be appropriate for them to receive credit for a proactive state program. The end of mapping is also influenced by jurisdictional issues and budget. The proposed credit should be adjusted so as to take these issues into consideration.

- Communication Checks- The requirement for monthly communication checks is too burdensome. We suggest this be revised to be regular communication checks with a minimum set as annually.
- Weighting – Because of the numerous agencies and jurisdictions involved in dam safety, as well as the mapping and documentation issues discussed above, we feel the quality of the State Dam Safety Program is very important. The State Program is a way for many of these issues to be coordinated among agencies and jurisdictions and to provide the necessary oversight. Therefore, it is our recommendation the State Dam Safety Program receive a higher weighting than proposed.
- Partial Credit – It may not be possible to have the same levels of mapping and communication checks on all dams due to the numerous agencies involved. For communities that are subject to dam inundation from multiple sources, partial credit should be given for having the required communication checks and mapping available for at least some of the dams. *French's note: This can be done through the impact adjustment.*

Southwestern City #2

August 31, 2011

Your Questions or Comments

General

Although the Southwestern City #2 will proceed with making application to become a CRS community there was discussion that we may not if the changes would increase demands on our staff. In anticipation that we will make it into the system prior to the changes and won't need to deal with those changes until recertification, we decided to move forward with the application. When the time comes for the Southwestern City #2 to recertify, if the changes are too onerous and require additional staff time to complete the activities I do not think our City Council would hesitate much in dropping out of the program. With that said, any other cities that are contemplating an application, these changes could possibly deter them from proceeding.

Midwestern City #2

8/30/2011

Your Questions or Comments

Activity 310 – Elevation Certificates

*Why FEMA Floodproofing Certificate and V Zone Certificate is required?

To me it's just duplication and more work. *French's response: The Floodproofing Certificate is currently required for floodproofed buildings, where an Elevation Certificate is not appropriate. They are mutually exclusive, not duplicative. The V Zone Certificate has information on it not found on an Elevation Certificate that is needed for actuarial rating. It would only be required for new buildings in V Zones in coastal communities.*

*Outreach projects--who is going to be responsible for getting all this information out to the public? We only work part time at the township. We include some information in our yearly newsletter on flood insurance. *French's response: That would be up to your PPI committee, if you opt to have one. Note that this credit is optional. You would continue to get credit for current projects. Note also, that regional PPI committees would be credited and encouraged in metropolitan areas.*

*The Program for Public Information--does every township need to develop this program? *French's response: No, it's optional for more credit.*

In my opinion some of these regulations are required but I also feel that we go overboard on lot of these requirements and documentation that is being asked. *French's response: Note that the CRS provides credit based on the community's program. Documentation is needed to evaluate and measure the program. Participation is optional. A community can also pick and choose which activities it wants to apply for.*

There is a lot of duplication between FEMA and EPA in trying to regulate the environment that it is just adding cost to all levels of government. To fully implement all the guidelines in the 2012 CRS manual we would need to hire people and don't have the funds to do that. We need to step back and determine what do we really need to minimize expenditures and still meet some of the critical items without duplication between governmental units/departments. How do we get things done without constantly enlarging the government regulatory base without more people and spending more money. *French's response: That's the basis for the CRS. The community can pick and choose how much it wants to do and what credits it wants to apply for. No community has to fully implement everything in the proposed 2012 Manual. We are working to reduce duplication and overlap with EPA's NPDES program.*

Southwestern County #1

August 31, 2011

211 – Prerequisites

A1. This section mandates insurance policies outside the scope of what may make fiscal sense. If a community has fully owned (no long-term financing) buildings within the SFHA, and is self-insured for such risk, you could quickly price the CRS program out of additional participants. Going beyond the Federal requirements to merely enter a Federally supported program sends the message of, either the requirements to have insurance are not good enough and we are trying to legislate without a vote, or this is a way to mandate the selling of more NFIP policies regardless of if they are required or not. Both are bad messages and prohibitions to increased participation.

B. BCEGS Prerequisite - If the CRS was developed as a holistic view of the cumulative effect of activities that reduce flood risk then it is imperative we continue to make it about flood protection activities. By requiring the community to have adopted a building code before allowing a rating of seven or less the program loses charter credibility of flood risk reduction. Per the FEMA pamphlet 573, "CRS discounts on flood insurance based on providing an incentive for new flood protection activities that can help save lives and property in the event of a flood". The published goals of the NFIP- CRS program are: reduce flood damages to insurable properties, strengthen and support the insurance aspects of NFIP, and encourage a comprehensive approach to floodplain management. The CRS classes for local communities are based on 18 creditable activities, organized under four categories: Public Information, Mapping and Regulations, Flood Damage Reduction, and Flood Preparedness. This prerequisite is not proportionally weighed against your goals or activities and unfortunately this policy make the program more aligned with effort over effectiveness, and building codes over floodplain management. Our interpretation of adopting a building code and acquiring a BCEGS rating only accounts for a small portion of the cumulative rating of a community, specifically, activity 430 under Mapping and Regulations. This prerequisite unfortunately discounts the great effort our County makes towards assisting the NFIP CRS program in reaching its goals, and simultaneously makes your ability to facilitate accurate insurance rates improbable.

Reduce flood damages to insurable properties and comprehensive approach to floodplain management – our County has an extensive Floodplain Management Program including 18" and greater freeboard standards, no impact community, buy out programs, 500-year standards, and extensive detention requirements just to name a few. We couple this with the plan review, permitting, elevation certificates, state of the art mapping systems, and inspections. Yet the prerequisite policy provides no incentive for going beyond what we had already been doing prior to entering the CRS program. We do it because it is the right thing to do to protect our community.

Strengthen and support the insurance aspects of NFIP – our County accounts for almost 25% of the policies for all our state's communities in the CRS. For activity 330 (outreach points), we are 50% higher than the state average, and 21% higher than the national average. There are numerous communities that obtain a mere fractions of flood insurance policy penetration, receive less credit for outreach, and still obtain a better CRS rating than our County. If portions of this goal also include the goal as published on the FEMA –CRS website to facilitate accuracy in insurance ratings, the prerequisite policy is counter to this goal. Our County stopped counting points because the return on effort to describe everything we do was zero after 1,001 points. To get a better idea of our points, realize almost every activity the City of Houston gets (2516 points) is something we could prove equal or greater effort. Secondly, initial analysis of the potential CRS 2012 weighing of points may increase our points significantly. Because after 1,001 points we get no value, communities that cannot legally adopt a building code may not be giving an accurate assessment to help the CRS attain its goal of accuracy.

Southern City #2

August 31, 2011

Your Questions or Comments

Activity 320 – Map Information Service

We should still get credit for giving flood information over the phone.

We answer numerous phone calls pertaining to flood zones and information daily. I do not know why anyone would think that we do not still daily give out flood information over the phone and in person. There are so many flood zones on our island and lots that have several flood zones. Our calls have never slowed down. If you look on FEMA's website at one of our lots you will be calling to verify which flood zone applies. Insurance agencies are 80% of our calls. I do think we should continue to receive credit for our time.

We should definitely continue to get credits for adopting the latest International Building and Residential Codes.

State Association #2

August 30, 2011

Please accept this letter regarding proposed 2012 changes to the CRS program from me, on behalf of the 49 members of our Users Group. Many of our members have participated in the webinar regarding the proposed 2012 changes to the CRS program, and then met via conference call on August 12, 2011 to discuss those proposed changes. The group is providing the following comments for your consideration before the changes are finalized:

- **General** comments about the changes:
 - Our members are in favor of updating and improving the CRS program. However, they have expressed a frustration with the fact that their communities have committed in the past to the CRS program and to doing certain activities they have selected. Now, it appears that some of those activities will have the points removed from them, and communities may drop one or more classes. There may not be cost effective elements that can be added to a community's program to make up for the lost points without significantly increasing the burden on the community. Those communities are faced with having to tell their elected officials of the decrease in class, and telling residents they will be losing part of their insurance discounts in this difficult economic time. We feel that just as our communities have made a commitment to participation in the CRS program, the CRS program should also make a commitment to the communities. When communities that are currently in the program and have earned certain points, and continue to do those activities, those communities should not be penalized by dropping classes. Please grandfather in those communities for those activities so that they do not suffer a drop in their class. Furthermore, many of our members feel that a decrease in class or loss of many points will cause elected officials to reconsider their commitment to the program, and divert scarce resources from CRS to other uses.
 - Given that the 2012 changes have not yet been finalized, and are coming so late in the year, we suggest that these changes should be made effective in 2013, and give everyone a year to evaluate the impact on their programs and make adjustments as necessary before the changes take effect.
- **Community Flood Insurance, 211.a:** Regarding the potential Class 9 prerequisite for self-insured communities or counties to show that funds have been budgeted and held in reserve to pay for future possible losses: A number of our members are self-insured, and funds are not currently held in reserve in the manner proposed. Given the current state of the economy, this is a budgeting issue and it will take some time to identify a source of funds, and accumulate the required reserve. Please consider moving this requirement to a higher class prerequisite, or providing at least five years to accumulate the required funds.
- **BCEGS rating, 211.b:** Increasing a community's BCEGS score takes more than political will, it requires staff time and money. It is also an economic development issue—more stringent requirements increase the cost of a project for developers. Given the state of the economy, and that most communities and counties have been through one or more rounds of budget cuts and downsizings in the past five years, this is a most difficult time to impose this requirement. For Class 4, the 5/5 rating is stringent enough. At the very minimum, please consider grandfathering in the

- communities which are already in the program and are meeting pre-2012 requirements as long as they maintain their current BCEGS rating.
- **Map Info Service, 320:**
 - While it is true that the general public now has available many new ways to obtain information about whether a particular parcel is located in the SFHA, local communities find that they still receive a significant number of questions regarding this issue. The CRS Group disputes the CRS Task Force’s contention that the points associated with this activity should be reduced. It is important the Task Force recognize the value of having a local official put a face to the flood insurance program, as these direct contacts with residents are some of the best ways for officials to discuss the benefits of the NFIP.
 - We recognize that no changes are being proposed to the way in which this activity is publicized. However, the requirement that the publicity be U.S. mailed to every address in the community is onerous. For most communities, budgets have been severely cut, and the money for these mailings is difficult to come by. The larger the population of a community or county, the higher the cost to do the mailing, making this especially difficult for the larger entities. Please consider giving at least partial points for other types of publicity, similar to what is being done in Activity 330. This may include publicity on the community’s web site, brochures made available, etc., as well as points just for providing the service, regardless of the level of publicity. *French’s note: A mailed notice to every address is not the only acceptable approach. Other acceptable forms of publicity include articles in newsletters or utility bills that go to all properties; notices sent to insurance agents, real estate agents, and lenders; and other approaches specified in a Program for Public Information.*
- **Outreach Projects, 330:**
 - The CRS community representatives were pleased to hear that this activity is being changed to allow more flexibility, and to no longer require certain prescribed paragraphs of text on ten prescribed topics.
 - The summary document details three types of outreach activities—informational materials, general outreach projects, and targeted outreach mailings. While we understand there will be a maximum number of points that can be earned, we’d like to see the maximum as one number for all three of these types of activities, not a separate maximum for each one. It is very expensive and difficult for larger communities and counties to do mailings to a large targeted group; they would like the opportunity to instead do many informational/general projects. *French’s note: That is what is currently proposed. The association must have been reviewing an earlier version of the proposed changes.*
 - Please be flexible when defining who is a stakeholder—this is especially an issue for counties, as county board members sometimes act independently of the board, and at times should be considered a “stakeholder”.
 - Please provide additional guidance for communities which wish to partner with surrounding communities to develop a PPI. Can the PPI be done on a county-wide basis or will it be restricted

to a specific watershed? *French's note: Multi-jurisdictional PPI committees will be encouraged and clarified. There are no plans to restrict the boundaries of such a committee, although it may be difficult for very large areas (e.g., multiple counties) to meet all the criteria.*

- **Acquisition and Relocation, 520:** It is our understanding that the total points a community will receive for this activity will be decreased. Many communities have invested a *great* deal of time, money, and community good will in dealing with owners of properties damaged by flooding, to achieve relocation or to acquire floodplain properties. These communities shouldn't be penalized now by taking away points they'd earned in the past. Please consider grandfathering in these points for communities who have already earned them. Furthermore, acquisition and relocation is one of the best, most permanent ways to mitigate flood losses. Why would you now put less emphasis on this? And, lastly, reducing available points if FEMA money is used is a disincentive to communities. Why put in all the effort required to relocate or acquire properties if the CRS program gives only partial points and doesn't value the outcome?

Thank you for the opportunity to comment on the proposed 2012 changes to the CRS program. We would like to request an official response to our list of concerns so that we may better understand the reasoning behind some of these changes. We look forward to hearing from you, and continuing to participate in this process.

Southwestern City #3

August 09, 2011

Thank you for the letter of July 29th listing potential upcoming changes.

214 – Recertification

The Town feels the proposal to collect Elevation Certificates on an annual basis rather than a five-year cycle will pose no problem to comply with. The Town receives so few Certificates that this change would result in a minimal increase in work.

The Town feels the proposed Annual Recertification Data Table will make reporting easier. The only suggestion would be to see if was possible to spell out acronyms at least once for those who rarely access this type of reporting.

The only other suggestion would be to send out annual reminders prior to the due date of these reporting changes once they go into effect.

From Southwestern City #2 City Clerk

Midwestern State #2

August 3, 2011

Your Questions or Comments

310 ECCF

The State is against dropping the credit for keeping elevation certificates in a computer format. We understand that the software will no longer be provided by ISO. We support eliminating the software. We have cities that have a computer format for keeping records that is either in something like an XL spreadsheet or tied in to the GIS data base. Those communities have a computer format of their own. Eliminate the software but not this item.

Record keeping is an essential part of floodplain management. Many floodplain managers do multiple jobs. A fast and accurate method for retrieving information makes them more efficient. This allows them to allocate more time to perform their duties as floodplain managers.

Good record keeping systems are one way that communities become better prepared for disasters. The new SDE software requires a lot of data for individual properties. Much of the required data can be found on elevation certificates. After a disaster happens it is essential to complete quick and accurate damage estimations. The damage estimation process will be faster if there is a data source that has a lot of the required information already compiled. An XL spreadsheet of elevation certificate data could be given to DAEs that come to a disaster if they are assisting with damage estimations.

A computer format of elevation certificates can also be used for flood management planning. A query of the data would show areas where homes have elevation certificates. Further query of the data would sort homes by the amount of freeboard. The data may show that homes in one location have more freeboard than homes in another location. Information of this kind helps to prioritize floodplain management planning. It would be used to decide where to do mitigation or storm water management activities. The community can use limited resources in the area where homes have a higher risk of flooding.

A community's floodplain management program benefits from a computer format for record keeping by making the community more disaster resilient and providing information for planning.

430 FRB

One of the proposed changes is to allow up to 300 points for up to 5 foot of freeboard. The current criteria allows for 100 points for each foot of freeboard up to 3 feet for a total of 300 points. Under the proposed changes the first foot of freeboard will be given less credit.

In dealing with community officials it is not always easy to get local officials to buy off on higher regulatory standards of any kind. The first one foot of freeboard is the most valuable because it is the most difficult to get and accounts for future rise in floodway. Once communities have one foot and that level works for them they then consider going to a higher level. Few communities go straight to a higher standard of two or three feet of freeboard without first having one foot of freeboard.

During the webinar we were told that the reasoning for giving less weight to the first foot of freeboard is because 80% of new policies are written with one foot of freeboard. One foot of freeboard was considered a national norm for this reason. Under the CRS program communities earn points for exceeding the NFIP standards not the average done by other communities. It would be more appropriate to change the NFIP standards for freeboard and then change the CRS.

Looking at the insurance ratings there is a larger price break going from BFE to +1 than from

Midwestern State #2 – Page 2

+1 to +2. The CRS points for freeboard might be weighted similar to the insurance rates. It should be said that the State has had a one foot freeboard requirement since 1998.

French's e-mail response: The proposal wasn't to keep the same lid of 300 points for up to 5 feet of freeboard, but that wasn't explained. We expect more points for freeboard and more points for larger amounts and prohibition of buildings on fill.

Midwestern County #1

August 30, 2011

Your Questions or Comments

214 – Recertification

In reviewing the proposed re-certification table that was sent out with this year's annual re-certification it appears that there may be information that may be difficult to obtain and provide accurate numbers on due to the large areas of our county and SFHAs.

Midwestern County #2

August 22, 2011

The Midwestern County #2 Planning, Building, and Development Department manages the CRS participation for unincorporated areas of Midwestern County #2. Midwestern County #2 entered the CRS program on October 1, 2008 as a Class 7 Community, and we have applied for a class modification and hope to be accepted as a Class 6 Community on October 1, 2011. We have reviewed the information available on the 2012 CRS Coordinator's Manual website and participated in the Webinar," the August 10, 2011 "CRS Activity 330 – Outreach Projects" webinar, and our CRS User's Group conference call. We offer the following comments for your consideration before the 2012 CRS Coordinator's Manual changes are finalized:

General Comments

The Midwestern County #2, Planning, Building and Development Department, and residents of unincorporated ___ County are grateful for being rewarded for our extraordinary commitment to reducing the loss of life and property due to flood damages with flood insurance premium discounts for our residents. We intend to continue this excellence to achieve the highest CRS community rating feasible for our community, and we recognize the 2012 CRS Coordinator's Manual changes will offer us new tools to minimize flood damages experienced by our residents.

General In the climate of a tumultuous economy, our residents have come to depend on the monetary relief offered by our CRS participation, and we are committed to maintaining our class rating and its associated resident discount. It is our hope these CRS Coordinator's Manual changes will not preclude our CRS participation and its benefits. If these manual changes will affect our CRS class rating, we implore you to consider offering a grace period to allow us to reach compliance with our existing class rating after our next Cycle Verification Visit in 2013.

Activity 320 – Map Information Service

Midwestern County #2 offers a comprehensive GIS mapping system to our residents through our website, and we offer web access to this service at our office at public computer stations. As a large community, a mass mailing to all residents is prohibitively expensive, but we do publicize this service online, and we are considering creating an informative video program for our own Midwestern County #2 cable channel "LCTV." We feel these means are an effective form of publicity, and it is our hope that the CRS Task Force will consider offering partial credit for publicizing our map service through "general outreach" projects, as defined by Activity 330.

Activity 330 – Outreach Projects

Midwestern County #2 is immensely enthusiastic about the proposed revisions to Activity 330 – Outreach Projects, and we appreciate the new flexibility of this program, which will allow us to tailor unique messages to our residents. We welcome the opportunity to receive credit for our "general outreach" activities, in which we already engaged, and this modification to credit scoring will create a greater incentive to expand our innovative outreach approach. As mentioned above, the expense of a mass mailing to such a large number of households is incredibly burdensome, as required in the 2007 CRS Coordinator's Manual, and it is our hope that outreach credit limits may be met by any combination of outreach activities (information materials, general outreach, and targeted outreach). A large number of general outreach projects will reach a varied group of audiences in a way "targeted outreach" can not.

In regards to the "STK – Stakeholder Delivery" credit, we ask the CRS Task Force to please allow the stakeholder definition to include independent elected officials. While the Midwestern County #2 Board Members vote on policy-making decisions, these individuals act separately from the Midwestern County #2 Planning, Building and Development Department. Midwestern County #2 Board Members have

established community relationships in their districts on levels other than floodplain policy and enforcement; these invaluable connects offer a

unique platform, and the credit bonus offered by the Stakeholder Delivery credit and its suggested outreach methods and topics offer an incentive to expand floodplain outreach, in addition to the informative mailings and community meetings in place. The public perceives elected officials as separate from the enforcing department, and outreach efforts made by elected officials to their constituents are welcomed in a way that correspondence from an enforcing body is not. This diverse and valuable form of outreach multiplies the community effort, as would any other form of stakeholder outreach.

Activity 360 – Flood Protection Assistance

Midwestern County #2 practices many aspects of Activity 360 – Flood Protection Assistance, but the expense of a mass mailing to all residents is incredibly burdensome. We feel general outreach projects are an effective form of publicity, and it is our hope that the CRS Task Force will consider offering partial credit for publicizing our map service through general outreach projects.

Activity 420 – Open Space Preservation

Midwestern County #2 is pleased the 2012 CRS Coordinator's Manual will expand the credit offered for open space preservation, as the Midwestern County #2 Forest Preserve District (LCFPD) is extraordinarily committed to preserving open space; a large amount of floodplain area is owned by the LCFPD and is preserved as native habitat. Overall, LCFPD owns more than 29,200 acres of property in more than 55 forest preserve locations; these preserves are made up of multiple parcels. Each preserve contains elements of the "NFOS – Natural Functions Open Space" credit, but documenting the activities taking place on each parcel is a daunting and arduous task. We hope the documentation for NFOS will not be overly demanding of staff time.

Activity 450 – Stormwater Management

Midwestern County #2 stormwater regulations are comprised of a set of very high standards, and we look forward to the expansion of credit in this area. We are particularly interested in learning more about the credit available under "DS – Design Storm." Midwestern County #2 is currently amending our Watershed Development Ordinance to include "runoff volume reduction" requirements, and we hope these changes will meet the standards set forth in the 2012 CRS Coordinator's Manual. We ask the CRS Task Force to consider allowing this credit to be flexible to accommodate each individual area of the country, as each region has unique needs. It would be challenging to amend the ordinance again to accommodate the new 2012 CRS Coordinator's Manual, if necessary.

Activity 520 – Acquisition and Relocation

Midwestern County #2 feels acquisition and relocation activities are an incredibly effective means of flood protection, and many repetitively damaged structures in Midwestern County #2 have been acquired and returned to permanent open space. Our community has invested a great deal of time and money in achieving acquisition of floodplain properties. It is our understanding that the points we have earned under Activity 520 – Acquisition and Relocation may be reduced, and we are very disheartened by this prospect. We hope these activities do not lose emphasis in the 2012 CRS Coordinator's Manual.

Thank you for the opportunity to comment on the proposed 2012 CRS Coordinator's Manual changes; we look forward to continuing to protect our residents from the threat of flooding through the implementation of CRS activities. If you should have any questions, please do not hesitate to call this office at (847) 377-2600.

Sincerely,

CHIEF ENGINEER/BUILDING OFFICIAL

Southern County #3

8/9/2011 12:12:04 P.M. Pacific Daylight Time

Your Questions or Comments

General

Statement;

It appears that more "credits" are available to coastal communities or other higher risk communities. Also, to communities who have not yet started actions to reduce the risk.

Activity 330 – Outreach Projects ACT

For those communities that do not have extreme high risk areas, such as coastlines or who all along have had regulation for the safety of person and property the "outcomes " credits or points" would not be increased by the 48% for example.

Southern County #4

August 02, 2011

Subject: Communities with a large number of policies

General

Prior to adopting our 2010 FIRM maps I noticed that the municipalities did not have much of a SFHA and some had no structures inside the SFHA. In realizing this, we decided to adopt an inter-local agreement between the County and each municipality allowing the County Floodplain administrator to administer there program but not be held responsible if they should be called to court on anything. This helps because the community visit is held with me and not each one.

Associate Planner

Mid-Atlantic City #1

August 4, 2011

Activity 330 – Outreach Projects, PPI

Our entire town is the SFHA. We have been doing two mass mailings per year to all the properties in the floodplain. Under the new formula (page 7) if we covered the 6 topics without a PPI and still sent it out twice a year, would be getting 84 points? Quite frankly, with all the budget cuts in New Jersey we are definitely looking at the cheapest way to maintain our Class 6. That is the reality of today's economy.....

Activity 310 – Elevation Certificates

My other comment has to do with the NFIP's surveyor's guide to the elevation certificate on the NFIP website. We used to direct The surveyors to that page when we found mistakes on the ECs and that really helped clarify issues. I do not believe that page Was ever updated for the ECs on the newest forms. It would be nice to refer people to that site again as it is easy to see the different Reference levels based on photographic examples. The link to that page no longer works.

I think these webinars are really helpful and informative. Without having the hassle and expense of traveling to a classroom, this makes things very convenient and cost effective.

CRS Coordinator for Mid-Atlantic City #1

Western County #2

August 31, 2011

Your Questions or Comments

Activity 330 – Outreach Projects

We recommend maintaining the current points for outreach and offering additional points for the new proposed activities. This will help the County maintain its level of outreach to promote items such as flood insurance, flood preparation, the availability of flood protection advice, and flood zone information. The County would still be encouraged to expand its activities to receive additional CRS credit.

If points must nevertheless be eliminated, we recommend removing activities which communities seldom apply for credit, instead of the more popular outreach activities.

Southern User Group #1

General and Specific Responses to Proposed New Changes to the CRS Program

- General statements have been made by Southern communities as follows:
 - The NFIP is in serious debt
 - To help resolve this debt, the CRS Program has been targeted and directed to propose much stricter criteria, more frequent audits, more reporting requirements and stricter prerequisites as changes to the Program.
 - Another new CRS goal is to more closely scrutinize the highest rated communities in the Program. This will also cost ISO more money from their budget.
 - The results of these changes are expected to be less premium discounts in many of the highest rated CRS communities, and consequently more revenue for the NFIP.
 - Since Florida holds a large number of policies, and has many of the best CRS communities in the country, communities in south Florida feel they are being unfairly targeted with these changes.
- Regarding the local CRS users groups:
 - Great time and effort has been expended to start user groups, and keep them relevant and well-attended.
 - No CRS points are currently or are potentially being awarded for conducting this activity.
 - It is hard to keep communities motivated to keep attending these meetings, and the monetary benefits is one of the main motivators.
 - When a meeting is held where it appears that more CRS points are being lost (example: dam safety) than being gained with manual changes, this discourages communities from trying to get better in the Program.
 - Particularly, a 3 foot freeboard requirement for reaching a Level 4 is regressive to some communities. Some members felt this sends the wrong message to other communities that are not close to a 4 that “Why should we keep trying to improve, knowing that a three foot freeboard threshold is there for a 4?” A three foot freeboard would be very hard to sell to the public and elected officials in southern states. It was also mentioned that a 3 foot freeboard could have unintended consequences and costs (Zoning and Building requirement changes?) in some communities that may not occur in others. *French’s note: This is not correct. There is no 3 foot freeboard requirement.*

General

A southern city agrees with the summary user group comments. We would emphasize that it appears the proposed changes are structured to help improve NFIP’s current economic position at the expense of communities that are working very hard to administer effective and compliant CRS programs. The proposed changes will likely result in increased costs for some communities to administer their current programs. The cost to improve its CRS rating may very well discourage many communities from actually following through, which also seems to be an objective in the proposed changes.

As stated in the user group summary comments, Florida communities, particularly those in South Florida, are of the largest stakeholders in the CRS Program. Similar to the treatment Florida has received by the EPA in their handling of the current Federal Numeric Nutrient Criteria rulemaking, it appears Florida would be a target for the proposed CRS Program changes.

Due to severe budget constraints, Plantation cannot afford what may amount to increased costs to implement and report on its current activities. The proposed changes are not giving Plantation much incentive to improve. Plantation agrees with the comment from one user group member that the proposed changes may result in some communities considering pulling out of the Program. The preliminary digital FIRMs are due to be provided to Broward County communities on or about September 30th. The implications of the maps, together with the proposed changes to the CRS Program, if implemented as is, may give some communities in Broward County cause to look closely at the option of pulling out of the CRS Program.

Southern City Engineer

We do appreciate everyone's comments and they will be forwarded to the Task Force. However, I cannot help wanting to clarify that the proposed changes are not related to the NFIP's "current economic position," other than FEMA and the Task Force want to be sure that what is credited actually has an impact toward the three goals of the CRS.

The most important goal is "reduce flood losses to insurable property." There has always been a debate over whether public information programs reduce flood losses. The proposal for 330 is to move away from national templates and toward more local flexibility in designing a public information program that is more effective locally. This does require a bit more work for communities to develop their own local plans, but we are encouraging county-wide or multi-jurisdictional efforts. Note that these proposed changes are the result of several years' of research, including input from a focus group that included local officials from the Tampa area.

Note also, that credit for some activities, especially open space preservation, will likely go up. We didn't cover this much during the webinars because we still don't know what the points will be.

Anyway, keep those comments coming. They will be heard.

French Wetmore, CFM

Thanks for the clarification, but in our area most of the county is built-out leaving little open space. Most places when a house is removed it is replaced with a duplex or high rise. I am exaggerating but it is to prove the point that South Florida is different from the rest of the State and that properties close to the water are in high demand for construction. In addition, most cities need the tax revenues they rather develop the parcel than converting it to open space and losing the property tax revenue. Again, this would not help our communities in South Florida.

Thanks,
CFM in a Southern City

What types of projects would have the greatest impact on reducing flood losses that are currently being under credited? Open Space and acquisition and elevation are obvious and get the greatest credits. If they're too hard to do in your situation, what's the next best thing that deserves more attention in the CRS?

French Wetmore, CFM

General

I am not looking only at my current city but for the greater good of the communities and the economic times we are facing. I am also a Councilperson faced with laying off 24 police officers and this type of program will not be on the top priority list. Unfortunately, most communities are facing hard economic times and these additional regulations are discouraging.

All I am saying is the existing program is time consuming and costly. Based on the current economic times, additional requirements will discourage communities from participating. One of the issues that favors communities is the relationship between stormwater and floodplain points. Points should not be minimized when the community belongs to both programs because additional water discharge regulations are being imposed by the State which will monetarily impact communities. Communities in both programs have to contend with the additional tracking, implementation and verification of stormwater regulations.

It would have been helpful if the research gathered would have included the user group that will be most impacted. *French's note: I believe this is in response to my statement that the changes to 330 came, in part, from feedback from a focus group in the Tampa Bay area.*

Thanks,
CFM in a Southern City

211 – Details on the impact of the insurance purchase requirement on user group communities:

We already provide Flood Insurance to all of our buildings that are owned by the community.

I am providing you this information for the purpose of the spreadsheet you will be preparing in the future.

We have a total of 34 buildings which include big buildings such as City Hall, Rec. Bldg. Fire Stations, Police Bldg. Aquatic Center etc. and then we have a number of smaller buildings such as bathrooms, concession bldgs. Storage, etc. in the Parks and Pump Stations bldgs. in one of our main canals, we pay a total of \$28,051.00/year in premiums for our Flood Insurance with a coverage of \$500K for the bldg. and \$500K on the contents for the Big Bldgs. And \$25 to \$50K on the smaller buildings.

Thank you for taking control of this important issue, because I believe like everyone else comments I have seen, if FEMA does what they are proposing, there are going to be a lot of cities pulling out of the CRS program.

Let me know if you need anything else,

Thanks,

Southern User Group #1, page 4

Building Director in a Southern City

Unincorporated Southern County

July 15, 2011

I would also would like add to others concerns, that the requirement for purchase of flood insurance for all County buildings in flood zone could have a cost higher than the CRS Savings in the Class 5, or even Class 1. Preliminary calculations show that it would cost us over 30 million dollars per year to buy minimum insurance for our buildings. The County cannot afford it under the current fiscal constraints and we may have to consider dropping from the CRS program.

Typically we flood-proof or strengthen the buildings to lower the risk of flooding and do not purchase flood insurance for non-residential buildings. The cost of real estate owned by the County in flood zone, is over 7 billion dollars. While we do not object the purchase for flood insurance to residential properties, it is not cost effective to participate in the CRS program if we must purchase it for all buildings in flood zone, including schools, administrative space, and commercial locations.

The savings of the CRS Program are very popular with our residents, however we may not be able to participate in the future.

We plan to provide comments to the items in the new manual. Please be on suspense for a letter from our upper management.

Southern City CFM

July 19, 2011

Our community generally does not purchase flood insurance – it is self-insured, except for buildings that received mitigation grants from FEMA, or that had been damaged in the past, and received disaster mitigation money from FEMA. Additionally, GSA does not administer all buildings owned by the County, so the figures in the budget book do not cover all current insurance costs, let alone the coverage for all buildings in SFHA.

Again, to buy flood insurance for additional buildings it would cost us over \$ 30 million. The County has been basically self-insured and we have over 7 billion dollars of building values located in flood zone. Our community did not budget for this change .

Incidentally, I based my information on the PTXA database – building values only, owned by all county departments, located in flood zones. Note that I did not include content insurance, or special equipment, in this estimate – just the structure cost.

I would like to see this CRS requirement removed, maintaining the original language, which require the County to purchase flood insurance only for the buildings where this purchase is mandatory.

If your suggested language would be adopted, we would had to prepare LOMAs for over 3,000 structures, including schools, hospitals, fire stations, park stations, marinas, arenas, port facilities, etc., in a year time frame. This would be also very costly, just considering County staff hours, let alone the cost of survey for old buildings, and LOMR-f fees. We just cannot afford this now.

Regards,

Southern City CFM

230 – Verification Visits

Also it should be pointed out that to single out a large community with a rating of 5 and scrutinize it beyond what is required of smaller communities just because we save over 20 million dollars, is not fair, especially since we are striving to minimize claims through better flood-plain management; it should be viewed not as how much our community (or any other large community) is saving but as how much we are saving the Flood Insurance Program by going above and beyond the Federal requirements to minimize flooding and thus minimize claims. I am sure that if our County would drop out of the CRS and require only the minimum standards set forth by the Flood Insurance Program, the loses to the Flood Insurance program due to increase in number and severity of losses will far outweigh the savings we enjoy now.

Southern County Floodplain Supervisor

General comments from a Southern City

I am disappointed because instead of the user groups becoming a model they are now useless. The point of the user group is to create encouragement among the municipalities to receive better ratings, but instead these groups will now be penalized and FEMA will be reviewing them frequently for doing a good job. It is very difficult to receive support from City Administrators and Council for this program because of the time and supplies needed in order to comply with each section of the manual.

It cost a lot less to execute this program in a small community while a large community will spend a substantial amount to educate the community. In addition, freeboard of 3 ft. is impossible for redevelopment. Most cities in our area are built out and a 3 foot freeboard will create flooding to the adjacent homes and neighborhood. It will help one property, but will create huge flooding problems

Southern User Group #1, page 6

for surrounding properties. In the city I live, property owners pack the Council meetings every time a new home goes before the commission for approval. The older homes are below or at base flood and the new homes look like monsters. The older homes are all slab on grade and elevating them will create structural issues along with substantial cost. This manual may apply in rural communities, but it does not address the issues of metropolitan areas. Creating the 3 foot freeboard as a requirement to achieve a rating of 4 eliminates most of South Florida.

If FEMA is looking to eliminate the program then that is what will happen because after reviewing the new requirements no community will be willing to participate in this voluntary program and instead of striving for better ratings they are going to go backwards and wean their communities from receiving the discounts until the program is gone.

The fact that points are taken away such as (levee and dams), that there are no incentive to receive better ratings and the cost involved in producing this program is higher than the discount, it is evident to me that soon ISO will not have enough communities to visit and all training for the CRS will become obsolete. At the end of the day the CRS is voluntary and purpose of the user groups was encourage better ratings, but the cost outweighs the results.

The user group has been very important to me and it takes a lot to keep it going, but now the incentive is gone and the reason to create this group has vanished because you cannot push a program that cannot be sold to administrators.

Thank you for taking the time to read my concerns, if you need further clarification please call me.

Thanks,
Southern City CFM

Western City #1

August 10, 2011

Your Questions or Comments

Activity 620 – Levees

Commenting on the new changes to section 620- Levees. I like the idea that communities can get credit on various new items that were not covered before. My community does not have a Corp approved levee, and also recently had a new Flood Study done. Since the levee is not approved it doesn't count as a way to stop water so over 70% of the town is in the floodplain. So with these new changes my community has a chance to save the citizens some money on their flood policies.

Midwestern City #3

August 2, 2011

Your Questions or Comments

Activity 320 – Map Information Service

I still get a lot of calls from resident and insurance company's about FIRM maps and how to read them. I've had residents that put there address in on the FEMA site and it takes them to a different area and not their property. I'm not the only one for my City that keeps a log of FIRM calls and other flood related questions.

Southern City #3

First Comment – July 20, 2011

RE: 2012 CRS Coordinator's Manual Changes

I attended the webinar today, July 20th. Thank you for all the information, it was very well done. I just have a few comments, questions or issues relevant to my town to share.

General

Southern City #3 is a very small coastal town (1,417 residents/1 square mile in size) directly on the Gulf of Mexico. Our entire town is completely located in the special flood hazard area. We have 4 full time employees: town clerk, deputy town clerk and 2 public works people. Our CRS Class is an 8 and our last 5-year cycle visit was in January 2007. Obviously there have been a lot of changes to the CRS Coordinator's Manual since our last cycle visit. I, as the Deputy Town Clerk and the town's CRS Coordinator, have worked very hard to stay on top of all those changes and these changes that are coming.

Is our town's situation (size/population/staff) unique to the CRS program? Southern City #3's Town Hall Building does not have flood insurance. It is self-insured. According to the changes in the program's prerequisites, we will need to provide some type of written information about our self-insurance. How do I find out what we need to do? *French's note: We have since posted additional guidance on a new 200 page on the CRS2012.org website.*

We do not have a floodplain manager, building department or engineering department. We do not have the total number of buildings in the SFHA. However, we will soon, as that is a change scheduled for 2012 with the "quick check" section 214 annual recertification.

Our town is currently built out – in the last 2 years we had no new construction or substantially improved buildings. Therefore the only elevation certificates I received were for PRE-Firm homes from doing more than \$10,000 in construction costs (which is required by town ordinance since our inception of the CRS program).

I have recently heard of some of our neighbor cities/towns had issues on their 5-year cycle visits with benchmark maintenance. I'm sure that we will too. My understanding is that the cost of having a new benchmark made is very substantial (\$10,000+) and that it may not endure the test of time. This topic was discussed at the Pinellas County Users Group a few months ago. My understanding is that there is no other method acceptable for points; however French mentioned something about GPS coming. I'm not familiar with this or know of its cost feasibility.

Just a few thoughts/comments - Thank you for your time – Deputy City Clerk

Second Comment – August 3, 2011

Your Questions or Comments

Activity 330 – Outreach Projects PPI

Hello. Just finished the CRS Activity 330 Outreach Projects webinar and have a few comments. Primarily my questions stem from our community being very small - 1,419 full time residents and only 4 full time town employees (none of which are a floodplain manager, engineer or building official).

We are not required to have a Floodplain Management Plan 510 due to having only 5 repetitive loss properties. I know that we have the option of using our Pinellas County LMS as our Floodplain Management Plan for a reduced number of points. Could it be possible to use the Pinellas County LMS as our PPI for reduced points? Or there is a local Tampa Bay User Group - could I use that as my PPI?

French's response: Your situation is one of the reasons why the Tampa Bay users group was created. I think it would be a better venue than the LMS group because of the orientation of the two groups. The CRS users group would be more into CRS credits and users groups in Palm Beach County and Mississippi have prepared credited public information program strategies (OPS). If the group wants more info, we might be able to have a webinar-type session to explain things when it meets.

Southern County #5

August 29, 2011

Comments to CRS Draft 2012 Coordinator's Manual

Section 200 Procedures (211 Prerequisites)

a.1. We agree that all municipalities should be required to have flood insurance for government structures that are in the floodplain. However, it should be up to the municipality to determine if this is done by self-insurance, third party flood insurance or a combination of the two. It was mentioned in the webinar that FEMA may no longer pay municipalities for flood damages to their properties. If that is the case, then shouldn't it be up to the municipality to determine the most cost efficient and economical way to insure itself? If FEMA is still concerned with potential liability then the municipality could sign a disclosure statement acknowledging its responsibility to cover any future flood damages to its own properties.

Activity 330 – Outreach Projects: Program for Public Information

As part of this activity, a public information needs assessment would be needed. However, it is unclear about the level of detail of the assessment. This assessment effort could result in a significant financial burden to a community (e.g. hiring of consultant).

Activity 370 – Flood Insurance Promotion

This activity calls for advising residents regarding flood insurance. A qualified insurance agent would be the appropriate source of information for this task. Municipalities do not have the appropriate staff to implement this activity. This is clearly an activity that should be undertaken by the insurance industry and its experts in the field. Government employees are not insurance experts and communities should not be subjected to liabilities for promoting the purchase of insurance policies or assisting in personal financial or insurance decisions. This may be a more appropriate activity for ISO in support of the CRS program. If local governments become a party to promoting activities or actions that may result in losses to residents (i.e. insurance company does not pay claims) they have a tendency to go after the community for restitution.

Activity 430 – Higher Regulatory Standards: Freeboard (FRB)

Proposed changes would result in reduced credit for the first foot above the base flood elevation. This change could penalize communities that are more developed (e.g. grading limitations).

French's note: We need to clarify that buildings can be elevated without filling, including on crawlspaces, piers, and stem walls (although credit would be reduced somewhat for the latter).

GENERAL COMMENTS:

Prior to implementation of any changes to the CRS Coordinators Manual some thought should go into the costs for communities to comply. More detailed and complicated CRS requirements may be good for justifying more FEMA consultants, but the burden to provide the data and manage the requirements rests with the community. If the costs to comply increases, but the benefits do not, then the community may have to leave the program. The public information program is a good example. Why does it have to be so complicated that it requires a spreadsheet to track? Activity 330 can be accomplished by answering two questions. Does the community have a public information program and does it meet the needs of the community. Why should a community spend thousands of dollars on a publicity campaign if they have done it before and know it is not cost effective?

Southern User Group #2

French's note: This is one of the most detailed and comprehensive set of comments we received. I have added notes to some of the comments and I have not included comments in the summary table that discuss the County's credits instead of the proposed changes.

Members of Southern County #2 Community Rating System Users Group individually and collectively reviewed the proposed changes to the 2012 CRS Coordinators Manual outlined in the NFIP/CRS document dated July 6, 2011. In addition, the Group solicited ISO to conduct a webinar with discussion opportunities for Southern User Group #2 and the surrounding region. The webinar took place on July 20, 2011, led by French Wetmore. The webinar was attended by approximately 30 local and regional coordinators and other interested parties at the VISTA Center. In addition, numerous others were online in the county, region, around the state, and as far away as Georgia.

Post webinar User Group discussions took place immediately after the webinar on the 20th, but the Group was reconvened on August 10th to compile the group's collective thoughts and concerns for submission to ISO before the August 31 deadline.

General

Overall Impression:

The proposed changes are occurring at a particularly bad time, when:

- Local jurisdictions in Florida are having to absorb more and more of the work burden for a number of program activities, with less support from state and federal governments
- At the same time, budgets and staffing levels are being challenged and substantially reduced because of the current economic crisis and changing political agendas and policies, requiring difficult choices to be made on what staff time can be given to
- Community officials are critically questioning the cost-benefits of all programs, including CRS.

Changes which reduce credits, threaten or impact class ratings, and/or increase CRS-related workloads and responsibilities may well lead to communities reducing participation in CRS activities and either accepting lower class ratings or dropping out of the CRS altogether. The officials of several communities are asking for justifications for the time and money spent on this and other programs.

All of the coordinators in Southern User Group #2 Users Group have primary responsibilities with CRS being an "additional" job function. The User Group helps offset this somewhat by capitalizing on the collective skills and talents of its member communities and sharing information to help improve floodplain management where resources are thin. Small communities, in particular, benefit from the User Group concept. Even with this benefit, however, it is becoming increasingly difficult for members to attend the monthly User Group meetings and engage in CRS activities. Some are beginning to accept lower class ratings by cutting back in a number of CRS activity areas.

The general perception is that credits are being taken away in some areas where hard work has previously produced good results but are taken for granted today. Most of the areas where some of these points can be made up will require a lot of additional work and time that many cannot afford.

The removal of default credits on activities such as dam safety will cause unavoidable class changes because of no fault of the community. This will be hard to explain to local officials critical to support of the program.

Finally, citing percentages rather than actual credit numbers, makes it impossible to realistically assess the impact of the proposed changes.

Activity 310

In general, the Group believes the criteria changes on ECs may be overzealous. While the Group supports the idea of improving EC quality, in some cases the people who receive ECs from the surveyors have little authority, control or knowledge and may be removed from the permitting function. Surveyors are often reluctant to redoing paperwork once submitted. While most communities take what they believe to be a hard line on EC procedures, some of the requirement changes are seen as arbitrary and non-value adding.

214 – Recertification: Submitting the increased numbers of ECs required will be very time consuming. Some requirements (e.g. signatures in the box) seem unreasonably arbitrary. **230 – Verification:** The increase from 80% to 90% seems unnecessary. And, not accepting digital copies is seen as a step backward by many. *French's note: we do accept digital copies.*

In general, the Group is not supportive of these the proposed changes in 310 and feels it creates unnecessary work, adds questionable value, and could potentially create political issues. *French's note: some of these comments appear to be about current criteria, not proposed changes.*

Activity 320

To penalize communities because of advances in technology and because information is now easily accessed and readily available seems unwarranted. *French's note: I believe this refers to the fact that FEMA's website provides everyone access to FIRMs, so a community map reading service has less impact, resulting in fewer points for doing the same FIRM reading service.*

Activity 330

The good news is communities can get full credit not just credit for OPS or OPA.

How realistic are the proposed outcome measurements?

There needs to be greater clarification on what ISO considers appropriate distribution methods.

Activity 340

It is nearly impossible for jurisdictions to ensure that stakeholders will comply with what they agree to do (i.e. publicize information, etc.). For example, realtors may agree to disclose information regarding a property, but knowledge of the agreement may be lost because of personnel turnover, or because the realtors just choose not to comply. This is a very difficult activity to monitor and enforce. Most jurisdictions have written these points off as not manageable.

Activity 350

The County's public library system maintains a comprehensive selection of FEMA and local flood related publications and documents well beyond the list in the change proposal. They are available for reference and copying in hard copy form or electronically online. The User Group just secured over 100 publications

to help the library update its holdings and suggested changes to improve accessibility. An interlibrary loan process provides access to all areas of the county. Library personnel including Spanish and Creole speaking staff are available to help the public locate documents and/or use library computers. In addition the County's Division of Emergency Management maintains an equally comprehensive library available to the public.

The County maintains a comprehensive Flood Awareness website which FEMA has acknowledged as a model in the proposed change document. The website is updated and enhanced on an ongoing basis. The proposed monthly updates are unrealistic and an unreasonable and unnecessary imposition on staff. It is updated whenever changes warrant. A major review, update and enhancement is done at least annually. That should be sufficient for full credit without imposing additional, arbitrary, unnecessary work requirements. Judge the quality of the product not the frequency of changes.

While we encourage our CRS municipalities to link to the County's Flood Awareness website, not all communities have the resources locally to duplicate these efforts. We view the County's website as a countywide resource, accessible to everyone. All our CRS communities (particularly User Group member communities) should get credit for piggybacking off that system since they play a role in reviewing and recommending changes. All municipalities within our County are tax payers and deserve the countywide services that are offered such as this.

Loss of shared credit would undercut the very benefit of the CRS User Group concept. *French's note: There are no changes proposed on credit for linking to county or regional websites. It is credited now, providing the information is locally pertinent.*

Activity 360

No comments, although the practicality of one-on-one assistance visits is a problem for county's the size of the Southern County, especially when staff levels have been greatly reduced for economic reasons. Where we are able to do this we do it, although record keeping may not always give us the credit we should get for the service provided.

Activity 370

[this comment was moved from 330] South Florida jurisdictions are under close scrutiny for ethic violations. Involvement in the promotion and sale of additional federal insurance policies through private sector agencies may be considered to be in conflict with the missions and ethics of local governments. We should not be held accountable for anything beyond informing the public of the benefits of insurance, mitigation, etc., not be held responsible for, rewarded for or penalized for the purchase decisions of residents or how many policies NFIP sells.

Again, there are limitations on how aggressively we can encourage the purchase of flood insurance within the guidelines established by our Ethics Commission. We may send the proposed changes to the Commission for a legal opinion.

Activity 402

Loss of default credit for open space is a concern to many of our User Group members. *French's note: Of the 216 Florida communities, 204 receive open space credit, 47 (23%) receive default credit. I didn't try to identify which ones are in your County.*

Activity 410 – *French's note: I can't relate these concerns to CRS credit, so they are not listed.*

Floodplain Mapping has been a sore spot for us. Ten years ago we were presented with proposed new FIRMS. The maps were reviewed by our jurisdictions and the County's Flood Mitigation Advisory Committee, chaired by the County's Water Resources Manager who reports directly to the County Administrator. The committee is comprised of approximately 18 members representing the county's top engineering consulting firms, the South Florida Water Management District, several of the 20 water control districts, water management staff from several jurisdictions and other stakeholder groups in

Including a Congressional representative. The proposed maps were riddled with errors, incorrect flood management assumptions, and did not reflect a number of flood management improvements that have taken place. The county shared LIDAR data with FEMA and the USACE that it had commissioned in unmapped areas as well as some previously mapped areas. For more than 10 years we have been waiting for new maps. Finally it looks like some progress has been made. In the meantime, we have dealt with totally outdated and deficient maps and studies. The Counties SFHAs do not adequately represent where flooding actually occurs. And the lack of mapping in the County's vast preserved open space area between the populated eastern portion of the county and Lake Okeechobee is not credited by CRS. Our efforts, time and costs to correct this do not earn credit while the lack of map is totally out of our control. We should be receiving credit for our due diligence (which we could document), rather than being shortchanged for the absence of physical maps.

We did not receive notice of higher standard funding availability until it was too late to apply for it. Not sure what happened there.

Activity 420

The natural shoreline protection changes require shorelines and channels to be in their approximate natural state without beach renourishment, rip rap, armoring, etc. These requirements penalize counties like Southern County that economically depend on their beaches and aggressively protect their coastal resources. The County is actively engaged in nationally recognized adaptation, retreat, and mitigation work to prepare for sea level rise and its impacts. Without intervention, shoreline communities will be at greater risk for flooding. Instead of losing points, we should be getting credit for what we are doing to better manage beach and dune erosion, limit coastal storm surge, slow salt water intrusion, and otherwise protect our environment and insurable properties. *French's note: This is a credit, not a requirement. The county would not be losing points, it would simply not get the credit for having beaches and shorelines in their natural state.*

Activity 430

Southern County is not a riverine community. In fact, it is both a riverine and coastal community.

Fill has worked effectively for decades to protect insurable buildings. Flooding is largely confined to street and yard areas which may isolate homes and cause loss of function for periods of time, but in-home flooding is generally rare given our size and can occur anywhere in the county. Most repetitive loss problems are created by surrounding development, road crown improvements, construction of impervious surfaces, etc., causing flooding where it did not occur previously. This is supported by the large percentage of flooding that occurs outside our Special Flood Hazard Areas.

A shift from fill to freeboard will be problematic and generally unnecessary and impractical for much of the county. It will be especially problematic in instances of redevelopment.

We believe our practices represent very high standards, but there is no doubt we will not be able to capitalize on these credits.

Southern User Group #2 – page 5

Activity 440

No comment.

Activity 450

No comment.

Activity 510

Most communities in Southern County use the countywide Local Mitigation Strategy Plan for Floodplain Management Planning credit. Our LMS is recognized as one of the best plans not only in the state but also in the country. Plans call for further enhancing the floodplain management sections of the LMS during the next plan revision cycle. Several enhancements were made in the 2009 edition. For some reason, some of our communities do not get credit or full credit for the LMS as their Floodplain Management Plan. Not sure if the community is not claiming it or whether ISO has not recognized it or given it the credit it deserves.

A University of Oregon study independently recommended to FEMA that Southern County's Countywide Post Disaster Redevelopment Plan is deserving of CRS credit. No credit is currently received.

Activity 520

No comment.

Activity 530

No comment. We are proud of our efforts on flood protection.

Activity 540

Given the size, complexity of the county's water features and the 20 plus agencies involved in drainage system maintenance (including a tremendously large number of private communities), the County does a better job than we probably get credit for and can document. Managing documentation outside the jurisdiction of the county is a challenge, but our plans, policies, practices, and handling of previous hazard events speak for themselves. We are not a simplistic riverine community which CRS program credits favor.

Activity 610

Southern County has one of the best all hazards warning and response systems in the nation. It has proven itself over and over again during many diversified disasters. It is supported with the latest technologies, communication systems and excellent working relationships with NOAA/NHC, South Florida Water Management District, the USACE, etc.

Activity 610 favors riverine communities with gaging equipment and systems that predict when a flood will happen. It does not recognize or give points for systems in place to handle storm surge caused by a hurricane or Tsunami. *French's note: The activity credits coastal and riverine flooding equally. In fact, more coastal communities receive 610 credit than riverine communities.*

Also, points for systems that are operated by federal, state or regional agencies will no longer be given. Since the tax payers are funding these programs they should be entitled to the benefit from them. One

suggestion would be to allow points for the systems operated by other agencies if the information provided by those systems is referenced and used by the community in their EWD plan. *French's note: There are no plans to eliminate the credit for using a flood threat recognition system operated by a federal, state, or regional agency. I think the concern was raised by our report that recommends deleting the section named "Systems operated by federal, state or regional agencies" and creating a new section name, which credits the same systems, regardless of who operates them.*

Activity 620

Either by our oversight or ISO's oversight, our levee systems have never been recognized or given credit. This will hopefully be an area for additional credit.

Activity 630

Loss of the state credit is not popular with the User Group members. We have been actively working with USACE and the South Florida Water Management District for several years to develop inundation maps. Credit should be received for this work over and above the default. The Herbert Hoover Dike (officially considered a dam when water levels exceed 15 feet) is considered by experts to be the second highest hurricane-flood threat in the nation, second only to New Orleans. Without intervention and strategic management of lake levels the USACE predicts a major failure will occur well before the 25 years it will take to refurbish and harden the dike. The USACE is actively engaged in a 25 year refurbishment and hardening project that started a few years ago. The County has been working closely with USACE and the South Florida Water Management District and with other counties surrounding Lake Okeechobee (the nation's second largest fresh water lake) to develop inundation maps. The first of these will soon be released for Southern County. Unfortunately only one or two breach scenarios will be mapped.

Consensus opinions are that inundation will be limited to the western communities depending on the severity of a breach, lake levels, and the effectiveness and timing of response (which can be considerable in a hurricane scenario). This would, in effect, take credits away from virtually all of the communities in the county. However, a worst case scenario (Hurricane Ono) done by a team of experts for FEMA and the State, presented the possibility of massive flooding covering virtually all of the county and the counties to the south for a period of up to 22 days. This would far exceed Katrina in the Gulf.

As our preparedness and response plans include the worst case scenario, losing credits in this activity would be unfair. We believe we have state-of-the art dam failure recognition, warning, operations, and evacuation/shelter plans and are continuously refining and exercising them. The lack of clearly established inundation information and maps should not be justification for taking credits away in this activity when a potential threat exists and we are doing all we can do to facilitate dam safety. *French's note: Based on this description, most, if not all communities in the county would get the state credit and the local dam failure planning credit (which it is not currently getting).*

Community Insurance

Finally, the Group does not believe CRS communities that self-insure for all hazards should be required to carry federal flood insurance. *French's note: The proposed prerequisite would credit self-insurance for flood losses, provided there was a formal self-insurance/risk management program. There is no proposal related to all hazards insurance.*

These comments are believed to be a fair representation the collective opinions of the 28 jurisdictions which make up the Southern County CRS Users group.

Western County #3

August 31, 2011

Education & Outreach Coordinator
Western County #3 Surface Water Management Division

Activity 330

1. Program for Public Information (PPI) Committee

We're concerned about the requirement that at least one-half of the committee members must be representatives from outside local government. We envision the committee being comprised of one SWM floodplain manager, one SWM education and outreach coordinator, one Western County #3 Department of Emergency Management (DEM) employee, and possibly one County building or planning department employee. We would like to develop the PIP in coordination with other local jurisdictions in order to have a consistent, coordinated education and outreach program throughout Western County #3. This would add possibly two or more local jurisdiction members. This means we need probably 5 or more committee members from outside government. Many organizations and businesses such as builders associations, insurance agents, lenders, Red Cross, etc., may not be able or willing to participate on the committee.

In the event we cannot get at least one-half of the PIP committee members from outside local government, we recommend language be added that allows us to document that stakeholders were invited to participate in the committee. We could also document that we provided stakeholders a draft PIP and asked for their review and comments. If stakeholders are required to be on the committee, we recommend a lower percentage so as not to restrict the number of local government staff who should participate.

2. Stakeholder Implementation

We're concerned that only projects implemented by an organization outside local government will get an additional 32% bonus credit and that "stakeholder implementation" is given a 16% overall weight for Activity 330. While some projects may be more effective when coming from stakeholders, some projects and messages are more appropriate for local government. For example, the topic "Know your local hazard" (e.g., providing and interpreting floodplain maps for private property) is best implemented by our Department. The topic "Protect people from the hazard (warning, safety, evacuation routes, etc.)" is also best implemented by SWM and DEM, with perhaps some projects/messages coming from the Red Cross and others involved in shelters, preparedness, etc. The topic "Build responsibly (get permits, substantial damage rules)" could be delivered by an organization such as a builders association, but we question how strongly they would advocate for getting permits. The two sample outreach projects shown on page 24 are both implemented by local government and would not be eligible for bonus credit, yet one is given "excellent effectiveness." French's note: I can't tell what page 24 she is referring to.

We recommend that the PPI identify which messages are best implemented by our local government and why. We're responsible for ensuring these projects and six (+) topics are implemented, and have the potential to receive additional points for projects shown to bring results, yet cannot ensure when, where, and how stakeholder projects are implemented. Given limited budgets for many stakeholders, most likely we would have to cover most project costs, and take additionally staff resources coordinating implementation. Only giving bonus credit for projects implemented by stakeholders does not recognize that some projects and topics are best implemented by local government.

3. Official Status for PPI and Activity 370 Flood Insurance Coverage Plan

We would like clarification on one way to achieve official status:

“Having the PPI Committee and process formally recognized in the community’s Floodplain management Plan (Activity 510) or Hazard Mitigation Plan.”

Western County #3 is in the process of developing a comprehensive Rivers Flood Hazard Management Plan. There are draft recommendations in the Flood Education and Outreach Program section of the draft plan. It is anticipated that the draft plan will be presented to the County Council in winter 2011/2012 for their review and consideration for adoption. If the plan is formally adopted and the following statement is in the plan, would this be sufficient to for our PPI and insurance coverage plan to achieve official status?

“The flood education and outreach program will be implemented through a Program for Public Information (PPI) as outlined in Activity 330 in the CRS Manual. The PPI will include a flood insurance coverage plan as outlined in Activity 370 in the CRS Manual.”

In large counties, such as Western County #3, it is very difficult to get the County Council to formally consider and adopt something like a “Flood Insurance Coverage Plan.” Since our River Flood Hazard Management Plan may be adopted before the revised CRS Manual requirements are in effect, we are hoping the above statement in the plan is sufficient to achieve official status for our PPI and flood coverage plan.

Activity 370

1. Flood Insurance Coverage Plan Committee

We’re concerned about the requirement that the flood insurance Coverage Plan (CP) committee members must include one or more representatives from (a) elected official or designated staff representative, (e) local insurance agency, and (d) local lending institution. We prefer to use our PPI committee to develop the Coverage Plan and incorporate it into our PPI. As stated above, it may be difficult to get committee members from outside organizations and/or an elected official or staff representative. *French’s note: Using the same committee is encouraged. The requirement for an elected official or staff representative has been dropped from a more recent paper.*

2. Plan Implementation

We would like clarification on the requirement that the coverage plan must be adopted by the governing board by a resolution stating the importance of flood insurance and is committed to implementing the plan.

If the coverage plan is included in a PPI that achieves official status, is this sufficient or do we have to have a separate resolution from the County Council? Is a resolution signed by the County executive sufficient? *French’s note: Using the same committee and the same plan document is encouraged.*

3. Technical Assistance

We would like clarification on the statement “Credit is provided for advising people with questions about flood insurance.” How extensive does the technical assistance have to be?

Western County #3 – 2nd Submission

August 31, 2011

Western County #3 Surface Water Management Engineer

211 – Prerequisites

[The following paragraph was moved from 370 to include this concern with the insurance purchase prerequisite.] Prerequisite for the community to have “all of its own buildings” including in Zone X to have flood insurance appears to be a steep hurdle for a community that may not have the resources but could mount an effective outreach to its residence. It is not a requirement that EVERY structure in the floodplain have insurance to score points so why the high bar for the community? The task force must recognize that in many communities the advocates for good floodplain management are not always in charge of the community’s purse strings and setting the priorities for the whole community. That doesn’t mean that a community can’t have an effective floodplain management program (as is assumed by this prerequisite) but the forces for good floodplain management must compete for funding with public safety, police, fire, courts, jails, schools, roads and other public services. I see this prerequisite as an unrealistic barrier.

Activity 330 – Outreach Projects

General observation on the combined activities:

While the Executive Summary [of the 330 Changes paper] emphasized the importance of “tailoring the information provided to the topic, the audience, and the desired behavioral change” the program gives no such flexibility for tailoring the makeup of the PPI committee to account for the unique characteristics and resources of a community. Each community will have unique relationships between its stakeholders and internal branches of government. This activity wants to allow a community to identify its needs and respond but the proscriptive requirements for membership on the committee will defeat this effort.

There is an unsupported assumption that permeates this document that the outreach campaign prepared by professional outreach specialist in the community is inferior to a campaign formulated by a banker, realtor and politician. While these stakeholders may bring fresh ideas and resources for projects within a targeted campaign, a professional within another industry does not necessarily have the time to learn the issues and then provide the time and resources to do the projects. I can see the benefit of an outreach project to bankers and realtors but to deny the efforts of a communities outreach program because a bank manager or broker is not on the committee doing an annual community self-assessment is not justified.

The document mentions “bonus points” for a PPI in many places. This does not ring true when it is proposed that doing the PPI will allow a community to obtain the SAME points they had in the past and without the PPI many activities will only qualify for a quarter to half points. If it were possible to get full credit for activities without a PPI by doing more that could be considered a bonus. As it is projects are given a ceiling for points no matter how many the community takes on or how successful they are.

Too much credit is being given to the PPI committee work. The PPI is required for credits in 330, 340, 350, 360 & 370. Information that has always and will continue to be provided to the public will only receive full credit if mentioned in and PPI. In many cases duplicate points are given for activities in a PPI that are also credited in another activity (240, 340, 350, 360, 370 & 510). This piling on of points is not consistent with other parts of the CRS program which demand a more rigorous evidence of a **reduction** in flood

losses. While perversely denying points to projects just because a community wasn't able to demonstrate it met the strict make up of an outreach committee.

The scoring is much too complex. It will be difficult to judge the value of the program that has so many multipliers, prerequisites and mandatory messages, linkages to other activities and alternating between vague goals (must be "thinking ahead") and proscriptive process (must have real estate agent on committee).

The "thinking ahead" message is not explained on how it will affect this activity and what must be done to get maximum points. This same paragraph is inserted into Activity 320, 330, 350 and 360, this leave a big question mark on much of the activities on how this will be implemented. Clearly "thinking ahead" as described does not relate to Reading the FIRM or Historic floods so no multiplier should be used in Activity 320. While a multiplier is not mentioned neither is how the "thinking ahead" would be implemented and since multipliers are used throughout the CRS program I would not what it used here. *French's note: The "thinking ahead" discussion is in the Task Force Committee's June report to the Task Force. More recent work by the public information team has not pursued this direction.*

Activity 330

Under Messages #2 – flood insurance needs to be shown as a required activity and it is shown as such on page 11. This can be a footnote or written in the main body.

This does not clarify if a PPI identifies one of the six listed messages as important does the activity count double? If not how do you get credit if the PPI affirms the six listed items as the community's needs? *French's note: The intent is to only credit messages that relate to the six listed CRS topics or four additional topics identified in the community's PPI.*

Can you get the full credit available if a Stakeholder does not do the activity? (this is related to if the STK is truly a bonus or required for full credit) If full credit is not given without the Stakeholder doing the activity how is this justified? Especially if the outreach is to be an evacuation plan which in the clear purview of government.

Are "bonus" points only given to the additional messages identified by the PPI or do they apply for the listed 6 messages? *French's note: The bonus points for PPI, STK, and ACT apply to all messages noted in the PPI.*

There is a disconnect on "Broadcast messages" it seems the only way to demonstrate a 90% saturation is through direct mailers, which may not be the best media for changing behavior. I have no idea how you would show the 90% on billboards, TV & radio adds that might actually be seen and heard by more people than the flood mailers that get "filed" with the junk mail. *French's note: The terms have changed. "General outreach" has replaced "broadcast." Only targeted outreach projects would need to meet the 90% reception criterion.*

How do you measure a YouTube clip that could go viral like the "Dog Doogitty" video produced by a local stormwater group with now more than 100,000 views in less than 2 months?

An Outreach message is "disseminated to people who do not ask for it" but credit is given to presentations made to groups? Do we have to do a bait and switch to get credit? (e.g. "hey we can come give a talk on rain gardens" and sneak in a quip on purchasing flood insurance) *French's note: The statement was intended to differentiate outreach projects from informational materials.*

The total points for this needs to be shown to have any idea how scoring will take place. The mixing of percentages and individual points for a message is too convoluted. *French's note: The more recent version of 330 Changes uses estimated points.*

Western County #3 – 2nd Submission – Page 3

There is no example of a mailer that discusses more than one topic. How would our flood bulletin score?
French's note: More examples will be provided after the direction for the activity is set.

Page 13 #5 says the PPI must be “adopted by the governing body” but just below that it explains how the PPI can be made official. One of the options is “adoption by the communities governing body”. I STRONGLY recommend dropping the clause in line #5 and allowing the 4 bullet points be used for making an official document. The County and City Councils have very full agendas, while flooding is important this seems to be a contrivance to “educate” the council rather than have any proven benefit to affect behavioral changes in our community. *French's note: Many communities have official documents and plans adopted by the governing body. Getting elected officials exposed to CRS credited floodplain management activities is one of the reasons for having plans adopted by councils and annual reports reviewed by councils.*

Activity 340

Credit should be given if a realtor is involved with this discrete project and not have to be involved on the entire PPI Committee. Let's respect the time commitment of our stakeholders and use them where they can provide the most good.

How to you verify that realtors are making the disclosures that will reduce the perceived value of the property and hence reduced their commission? *French's note: this is a problem with the current credit and will be addressed in future verification procedures.*

Activity 350

Why the doubling of credit when in a PPI? Another case of PPI inflation.

Appendix A

The plan requires a huge time commitment for the committee members. The committee is responsible for annual reports, the Self-Assessment, identifying and creating messages and monitoring the successes of the PPI initiated programs as well as activities by other groups and governments (required in annual assessment). This is too much to ask of volunteers let alone busy elected officials. The burden **will** be carried by the local floodplain office and too much effort will be required to make it appear that everyone else is involved. This is a set up for systemic failure or gross misrepresentation of broad involvement and not with an eye on successful outreach. Stakeholders can and should be invited and brought in to discuss outreach and needs, but it is too much to have them full time members of a committee. *French's note: Future language will clarify that is assumed that staff would do the legwork and the committee would meet to review, discuss, revise, and approve the staff's documents.*

It would be better to work with local mortgage/realtor/insurance professional organizations to coordinate messages that to have a single agent or broker on the PPI committee. There is no credit for the broader and more efficient approach. This plan stifles creativity and imagination in favor of a rigid preconceived idea that could work in some community but not for a nationwide program.

While I can agree with the assumption that a message is effective if received from more than one source I don't agree with the explicit assumption that an external stakeholder must be part of the entire process of the PPI committee in order to have multiple source messages.

The committee is supposedly as small as 3 individuals but with at least 50% coming from outside of government this could be just one local government person on the committee, but the list of others is [sic] *French's note: Committee membership has been modified in the latest version of the 330 Changes paper.*

The appendix give two list of possible stakeholders outside local government (page 20 last paragraph and bullet list on page 21); just have one list. *French's note: Committee membership has been modified in the latest version of the 330 Changes paper.*

Activity 370

This is another activity that double dips on credits, along with requirements for a 330 PPI process that meets the strict committee requirements.

[Paragraph moved to 211]

As noted to ISO in other correspondence the annual CD with flood insurance data is not given in a timely manner (last CD mailed on August 15, 2011 but with data from January 31, 2011). Errors in the location of the policies and attribute to the community (correct CID) are rampant. In the most recent CD sent to County of the 2253 policies listed in our community only 652 were actually in our community and had an effective policy. It will be impossible for a community to evaluate its needs when only 29% of the data is valid on the day it is mailed from ISO.

In the paragraph on FIA credit it is not clear if “information for each of the community’s” is referring to the “floodplain management plan” or the “flood insurance coverage assessment document” (see page 3 last sentence before “b. coverage plan”)

On coverage plan it list ways to achieve official status “COULD” include... and gives a list of options. Using the word could implies that there are other paths that could be taken. What would be the process a community could take to use a different path? Could this alternative way be used to get official status of the 330 Outreach plan too?

Committee for the coverage plan item (1) says the plan “MUST” be prepared by a committee... if this said “should” the community would have the flexibility to tailor its needs. This list mandates more seats than the 330 Outreach Committee does.

Making the coverage plan public is good; requiring that it be submitted to the governing board (i.e. county council) seems contrived. Is the point to reach out to the public or our “governing board”? Our flood regulations are created by ordinance with the expressed purpose (PCC Title 18E.70.010) to give our citizen the ability to purchase flood insurance through the NFIP. Continually filling up the council docket with flood outreach activities that are already in our approved budget and mission seems redundant and could be seen and not respectful of the council's time.

Coverage Improvement- the prerequisite to have at least three credited activities is an encouragement to small projects but doesn't credit grand scale activities.

Need to see the guidance that is to be published in Section 301 of the Manual for “how buildings are counted for CRS credit”. This paragraph mentions “insurable buildings” within quotations. This leads one to wonder if the CRS program has a different definition of insurable building than 44 CFR. *French's note: There are no plans to change the guidance that is currently in Section 301.*

The data CD given by ISO does not state how many structures are on a policy but only gives a single address. It will be impossible to rectify the number of buildings in the floodplain with the insurance policies since the data given make no mention of structures. Hence the CI credit will be impossible to measure.

Midwestern City #4

August 10, 2011

Re: BCEGS Requirement for proposed 2012 CRS Coordinator's Manual

The building codes and code enforcement only applies to buildings, it would be much better to use other legal or regulatory tools that are encouraged by the CRS Program such as a Floodplain Ordinance, Zoning Ordinance, and Subdivision Ordinances to prevent that building from ever being constructed in the floodplain to begin with. **Placing such high reliance on utilizing a building code as a primary means of flood damage reduction matches the analogy of closing the barn door after the horse got out, the other components of the CRS Program will provide a much more effective means of flood damage reduction by not having a building in the floodplain to start with.** There is definitely a role for building codes and code enforcement in the reduction of flood losses that the CRS Program needs to encourage, but the role of codes and code enforcement is only as the last line of defense. Using the BCEGS score to limit the CRS Class establishes the BCEGS score as the most important factor in how a community is to be evaluated in its flood damage reduction activities.

The International Building Code itself is inconsistent with the Higher Regulatory Standards encouraged by the CRS Program. Section 1612, Appendix G, and Appendix J are the principle requirements yielding flood damage reduction measures. However, a review of **Section 1612.2 Definitions**, of the **2009 International Building Code for DESIGN FLOOD, DESIGN FLOOD ELEVATION**, and **1612.3 Establishment of flood hazard areas** (see pages 338 and 339 of the 2009 IBC) establish and have flood damage reduction requirements in the Special Flood Hazard Area only identified on the FIRM and only to the Base Flood Elevation without provisions for freeboard, extent to horizontal areas covered by the freeboard, and does not apply to areas upstream of the FIRM limit of detailed study. The CRS Program encourages extending the floodplain prone areas well beyond just the limited area of coverage by the IBC and provisions of a freeboard. It is only by means of extraordinary local measures that the I-Codes can be rendered consistent with the Higher Regulatory Standards encouraged by the CRS Program. The CRS Program should reward those extraordinary local measures, but currently does not. **The CRS Task Force cannot assume that the I-Codes alone provide the encouraged levels of flood protection for a building; therefore, should not be a sole means to establish the flood damage reduction activities of a community and if it is solely used to establish a CRS Class as currently proposed.**

The ISO edition 01-95, 1995 **Building Code Effectiveness Grading Schedule** consists of 20 numbered pages; the classification is based upon achieving points from 0-100, with 61.00-68.99 required for a 5 classification. The BCEGS score is dependent upon many factors that are unrelated to flood damage prevention. On page 17 is the only point assessment related directly to flood damage reduction and is in **Section III 330. Inspections for Natural Mitigation Hazards** and only provides for 1.5 points out of a 100 point scoring system. **Direct flood damage reduction measures are not directly measured by a BCEGS score, so should not solely be a determiner of a CRS Class of a Community.** It is a tool that can be useful as it is now used,

but beyond its current application is not warranted. The BCEGS score is a numerical quantity that can be used to determine the effectiveness of building codes and code enforcement, but is not necessarily a measure of the entire approach of a community for flood damage reduction. The BCEGS score is an easy number to utilize, but just because it is easily obtainable it should not overrule the other features of the CRS Program.

The Midwestern City #4 concurs that there is flood damage reduction potential available by use of building codes and code enforcement. **However, the area of protection by building code and code enforcement is extremely limited in scope to either the footprint of a building or if constructed on fill to an area 10 feet beyond the footprint of the building.** There are times that migration of a structure to flooding risks must depend solely on the building codes and enforcement, but ideally those should be limited to only pre-FIRM structures. The CRS program should be to encourage no new construction in the floodplain and removal of pre-FIRM structures from the floodplain.

Communities that are currently Class 7 or better have already demonstrated and verified that they have/are taking extraordinary measures to reduce the amount and severity of flood losses. If the BCEGS score becomes the driving factor in a CRS Class then many CRS communities will request new BCEGS scoring in advance of the usual 5 years BCEGS reevaluation cycle. The increased workload on ISO very likely exceeds their current resources. **Many communities could be downgraded and have their Class increased through no lack of efforts in reducing flood losses and no fault of their own, solely due to the increased workload on ISO BCEGS scoring resources. Consequently, that will result in communities not wishing to pursue additional CRS proposed activities that are known to reduce flood damages. The attitude is likely to be, “Why go to the CRS effort to improve our Class, we can do nothing more until ISO can get around to giving us a new set of scores.” It would be counterproductive to good floodplain management.** *French’s note: ISO intends to reverify BCEGS scores in the same year as the CRS cycle visit. That should handle this concern.*

Building codes and enforcement (evaluated by BCEGS) are recognized that as a last ditch effort to reduce the flood losses, but would have its greatest impact only with new buildings in the floodplain that should not be constructed if the community is following the remainder of the CRS program recommendations. It is also helpful in mitigation of Pre-FIRM structures after the structure has been “substantially damaged.” Some reliance on the BCEGS score is appropriate and the level it has been relied on in the past has proven adequate. This is a situation that would best be unchanged.

Our recommendations to the CRS Task Force are:

1. Leave the BCEGS score requirement of 6/6 unchanged for Class 5 and higher communities,
2. Leave the BCEGS score requirement of 5/5 unchanged for Class 4 or better communities,
3. Do not consider the BCEGS rating except at times of new applications or at times where a community is requesting an upgrade in CRS Class,
4. Do not downgrade an existing community solely on the basis of new BCEGS scoring criteria, or
5. If new BCEGS criteria are applied make it not effective until after the normal BCEGS reevaluation cycle will have elapsed in 5 years. *French's note: ISO intends to reverify BCEGS scores in the same year as the CRS cycle visit. That should handle this concern.*

Southern City #4

August 2, 2011

Your Questions or Comments

211 – Prerequisites

The city is having issues with the BCEGS prerequisite. Due to our city's size, we do not require plans for all residential additions. This keeps us from getting a BCEGS rating of 6.6 or better. Currently, the city already requires plans for residential additions in the floodplain but this does not help us with the BCEGS rating and gives us no credit for this requirement. The prerequisite should be reconsidered. *French's note: Ralph Dorio of ISO BCEGS confirmed that this is correct.*

General

Also, it seems with the new CRS manual focusing on getting more PRP policies, it would be nice if a CRS credit was given to PRP policies.

Consultant #2

August 3, 2011

Your Questions or Comments

General

Having been a former CRS coordinator for 10 years, I believe that I can speak from experience. I have reviewed the proposed changes to the CRS Program Manual and can understand the intent of the Program and Congress in requiring such changes. However, my biggest concern is that these changes will place an additional burden and workload for the CRS Coordinators who I believe are already inundated with a hefty workload, as in the majority of cases, this program is usually handled by one individual in the community as an additional duty along with others (i.e. Floodplain Management to include permitting, in some cases, and possibly mitigation grants as well). The chances of a CRS Coordinator getting additional help with this added workload are next to slim and none considering the fiscal constraints and streamlined budgets being experienced across the country by communities in these austere economic times. In most cases, communities are looking to downsize, consolidate, and/or eliminate positions in order to remain within budget guidelines, not increase. Hence the remote possible chance for additional help. I realize the benefits this program provides to homeowners in creating discounts on their National Flood Insurance policies, but where is the happy median? The unfortunate answer to that is there probably is none. Just some thoughts from someone who cares and had to deal with this dilemma for the entire period mentioned above. t

Western County #4

August 1, 2011

Your Questions or Comments

214 – Recertification

In response to the Proposed Annual Recertification Data Table:

Item numbers 1, 3, 6, 7, & 8 we would have an extremely difficult time recording these numbers. Under all impact adjustments, we were not able to count buildings so we had to use an option that did not require a building count. Why would you require communities that do not use a building count impact adjustment option to later require a building count?

For our Local Hazard Mitigation Plan we use an estimate and the number is only updated every 5 years with the plan.

Activity 340 – Hazard Disclosure

[submitted separately on September 1]

I'm not very happy about dropping the 20 points for State disclosure law. Are you finding that all the States have this law?

To receive the 46 points, copies of completed disclosure notices from at least five local real estate agencies showing that they are advising potential property purchasers of the flood hazard and the flood insurance requirement was impossible for my community to obtain. This document is between the seller and the buyer. We did call real estate agents and companies to ask but they were not receptive to our pleas.

I spoke the Western City and their CRS coordinator did this by going around the office and talking to the employees to get a copy of theirs. It seems that we should not have to go that far.

I have asked the State CRS coordinator to submit the completed disclosure notices on our behalf (which would also benefit adjoining communities) and they haven't made any progress on that either.

I think you should reconsider dropping the 20 points to keeping the 20 points available.

Southwestern County #2

July 19, 2011

Your Questions or Comments

Activity 310 – ECCF – ECs in computer format

I am a one person Floodplain Management Office working under the Emergency Manager. Having my EC data in my permitting software and identified on my GIS Flood maps, provides the following benefits:

1. I can quickly give accurate information to citizens without having to dig through a file cabinet. This saves time and money for both myself and the requestor.
2. I can easily e-mail documents to requester without having to find and scan document. Again save time and money.
3. I can access documentation for remote sites such as, in the field during inspection, command center in an event, EOC in an event, etc.
4. I am less likely to "miss" important information

Activity 330 – Please, Please, Please have a webinar on this activity!!!!!!!!!!!!

Activity 430 – Community driven standards

FRB-Freeboard: I am in Northern New Mexico. My deepest BFE is approximately 4 ½ foot above land. I already have a 1 foot freeboard which would bring a structure built in this area to 5 ½ foot above the land. It is unreasonable to increase my freeboard and in turn cause, using our previous example, a structure to be built 6 to 9 foot above the ground.

The proposed decrease in credit for 1 foot of freeboard and increases for more than 1 foot penalize my community, instead of taking into account the type of flooding (shallow) that my community experiences and rewarding it for going above the standard. It was mentioned that 1 foot of freeboard is the standard. It may be a standard for some areas, but is it the standard for Arid Regions?

Western City #3

August 2, 2011

Your Questions or Comments

1. Activities are typically credited if done on an annual basis. If our community pays for our own FIS study and that data gets incorporated into the current effective FIRM and we receive credit in the current CRS year, do we continue to get the credit for subsequent years if no more studies are done in the following years after receiving the credit?

Answer provided: You will continue to receive credit for a study that has been adopted in your regulatory program as long as that study is used. If FEMA prepares a new map with a higher base flood elevation, you will need to adopt the new FEMA map and you would lose credit for your older study.

Activity 420 – Open Space Preservation NFOS

2. For credit in 420, will we get credit for protecting open space in areas not located in the floodplain? Our City has a program by which we collect funds through tax dollars to purchase open space to be kept in their natural state in perpetuity to create a greenbelt, protect wildlife corridors and protect natural functions. Would that count for this or any other credit points?

Answer provided: At this time, we only credit open space in the regulatory floodplain. You raise an interesting point that we will have to consider. Any changes in the current policy will be noted in the new Manual.

Southern City #5

August 30, 2011

Your Questions or Comments

Activity 370 – Flood Insurance Promotion

With the condition government budgets are in these days, incurring extra hard costs to implement Activity 370 may be a burden some communities are unable to undertake.

214 – Recertification

The spread sheet that would be required annually with recertification is a duplication of the FEMA biennial report. It would be good if FEMA were to drop that and just get the information from the report we will be submitting annually with recertification.

Activity 430 – Higher Regulatory Standards, Regulatory Administration

Under Activity 430, new element RA will probably require additional hard costs. With government budget cutbacks being the norm, trying to do this element could be difficult for many communities.

Southern County #6

211 – Prerequisites

I agree with you that it is a biggy – I had a tough time approaching the topic years ago.....The other huge hit we took was the cost of property wind coverage which is sky high in premium costs.....

I have just confirmed what we have the books today....we have 37 structures with flood insurance (A & V zones) and are anticipating a map change in 2012/2013. I spoke to our county risk management staff who stated that the current cost of insurance for flood ins for these properties is a total premium of \$130,000 a year. Not too bad. They did go through an internal exercise of determining what structure had value to worthy coverage and what they would live without.

So in lieu of the blanket statement as suggested – I would proposes this kind of scrutiny by community.

We are in the process of getting this reflecting in an internal GIS layer.

Southern City #6

August 5, 2011 5:50:18 MDT

Your Questions or Comments

214 – Recertification

Question concerning #3. Number of other new 1-4 structures constructed since last report.

Does ISO/FEMA want the actual number of individual buildings or number of units?

If looking to project possible insurance policies of population increase the number would change from one building but four units.

French's e-mail response: Good question that we'll make sure we clarify in the future. At this time, we're talking buildings rather than units. I realize that condos mean more policies than buildings, but buildings are our standard measure of development.

We have our permit system set up to reflect permits per electric meter, so one apartment building will have 78 units (permits) and common spaces.

Our numbers will be greatly inflated depending on the condo/ multi permits without individually opening and reading the plans or permit.

It would take a few days to filter through the data but accomplishable.

Western City #4

August 26, 2011

Your Questions or Comments

214 – Recertification

A few comments on the proposed Annual Recertification Data Table:

1. It would be useful to know what tangible benefit in flood protection this report is expected to achieve. The report appears to be data compilation for its own sake.
2. The report will prove quite burdensome for communities to complete. Many small communities do not have permit tracking software or geographic information systems (GIS) to generate the reports necessary to fill in the requested data.
3. The reporting period is unclear since reports may be submitted on different dates from year to year. If the form is required, it would be simpler to align the data table with the calendar year or fiscal year.
4. FEMA would be a better source of data on the number of LOMRs and LOMAs issued than would individual communities.

Southern State #1

August 26, 2011

Task Force Members,

Thank you for the opportunity to provide comments on the proposed changes to the 2012 *Community Rating System Coordinator's Manual*. We commend the Task Force for its efforts to improve the Community Rating System (CRS), which provides important tools and incentives for communities in our state to reduce their vulnerability of a range of natural hazards. While the CRS program seeks to reduce flood losses by incentivizing measures that go beyond minimum floodplain requirements, these measures can also complement coastal zone management efforts to address shoreline erosion and development - a core focus of our state Coastal Zone Management Program. Many of the CRS priorities align well with those of federal and state coastal programs, and the CRS program offers excellent opportunities to improve coordination between local, state, and federal efforts to reduce vulnerabilities to coastal hazards.

The recommendations outlined below are intended to improve linkages between the CRS program and our coastal zone management program. We believe that improved coordination will strengthen coastal planning at the state and local levels while providing opportunities for beachfront communities to achieve additional "coastal" CRS credits and lower flood insurance premiums.

"Coastal" credits available under the CRS program include incentives to map and monitor beach erosion zones, expand outreach to the public, reduce dependence on hard stabilization structures, and limit development encroachment into hazardous beachfront areas. After analyzing CRS scores in our state, we discovered that only two of the eighteen beachfront communities currently receive "coastal" credits under the CRS program. For example, the Town of Hilton Head Island scores the highest, with 125 "coastal" credits. Comparatively, beachfront communities in another state average approximately 250 "coastal" credits, which equates to nearly half a CRS class (potentially a 2.5% savings on homeowner insurance premiums). Based on our review and input from CRS coordinators, we would like to offer the following suggestions on how to better integrate the CRS program with our coastal program efforts, and ultimately improve beachfront community "coastal" credit participation.

1) It would be beneficial to have state coastal managers trained on the CRS program and process. On a regular and ongoing basis, our planning staff work directly with state and local government officials on a range of issues related to ocean and coastal hazards. For example, SCDHEC-OCRM staff assist beachfront communities with the development of Local Comprehensive Beach Management Plans (LCBMPs), which are required under the SC Beachfront Management Act. Elements of the LCBMPS s address risks from coastal storms and erosion. This process affords a perfect opportunity for communities to utilize our office's technical expertise to address certain CRS requirements (i.e. Mapping Coastal Erosion, Coastal Erosion Regulations and Monument/Monitoring System credits). Furthermore, the CRS program should recognize and provide credits for state and local plans that address coastal erosion. including our State Beach Management Plan and LCBMPs.

Special Hazards – 410SH and 440SH

2) Currently, the Mapping Coastal Erosion credit provides up to 50 points for mapping a community’s erosion hazard area, and the Erosion Data Maintenance credit provides up to 20 points for monitoring erosion data along the community’s beachfront. Our state coastal program provides these services coast-wide, but the credits are only available if a local community has also received the Higher Regulatory Standards setback credit. Given the limited number of beachfront communities that have adopted regulatory setbacks that exceed the state’s beachfront setback, and importance of beach erosion mapping and monitoring for planning and public education purposes, we recommend that the Task Force consider providing a uniform credit for state-level beach erosion mapping and monitoring, and that erosion mapping and monitoring credits be linked to a beachfront real estate disclosure or other requirement (rather than the HRS setback credit requirement). Also, on a national scale, fewer than 10 coastal states utilize erosion rate-based shoreline setbacks, so the existing requirement that communities adopt an erosion-rate based setback appears to limit the availability of these credits to fewer than half of the coastal states and territories.

420SH

3) Currently, the coastal erosion “open space” credit provides up to 35 points for preserving at least five acres of open space that includes dune and beach areas seaward of the frontal dune. However, this credit does not consider the length of a community’s beachfront shoreline, and therefore a community with a long shoreline could achieve full credit with a very narrow beach preserved as open space. The CRS program should provide credits based on the average distance between mean high water and the line of development; or, alternatively, should use a formula that accounts for shoreline length in calculating open space. Communities should also receive credit for beach and dune areas that are preserved as open space landward of the frontal dune (but seaward of development).

410SH and 430SH

4) We strongly urge the Task Force to consider additional credits for improved erosion mapping, monitoring, and management along non-beachfront coastlines, including coastal estuaries. Credits should be given for riparian buffers and setbacks, as well as specific programs to promote or require the use of alternatives to traditional bulkheads for erosion control (e.g. “living shorelines”). Credits should also be given to communities that have inventoried existing shoreline alterations (bulkheads, revetments, etc.) and identified high value conservation areas that would allow for the future inland migration of coastal wetlands under various sea level scenarios. *French’s note: The new Natural Functions Open Space (NFOS) credit in Activity 420 – Open Space Preservation should do some of this.*

Again, we appreciate the opportunity to comment on this important work. Please let me know if you have any additional questions, and we look forward to continuing this discussion.

Sincerely,

Southern State Coastal and Resource Management

Southern City #7

August 31, 2011

This letter is regarding the proposed changes to the CRS Coordinator's Manual and written on behalf of the Southern City #7. We understand a number of significant changes are being proposed for the 2012 CRS Coordinator's Manual scheduled to be effective February 2012. The City strongly objects to several of the proposed changes as listed below.

- **Section 214 Recertification** -Application and Recertification Program Data: The City currently does not have the capabilities to process and keep track of this information and it is unrealistic to require the City to maintain this level of documentation which would require additional staff and software applications. We do not understand how a majority of this information will benefit floodplain management within the City. While this information may benefit FEMA, it will come as a large cost to the City and ultimately to the taxpayers, with little or no benefit to floodplain management within the City.
- **Activity 310 - Elevation Certificates:** The proposed change to require submittals of all of the previous year's Elevation Certificates with every year's recertification package will require the City to scan, catalog, and purchase additional hardware and software. This may appear like a reasonable request for smaller communities with a limited floodplain area; however, it is a major undertaking for large municipalities such as the Southern City #7 whose municipal boundaries are almost entirely within a floodplain.
- **Activity 330 - OPS:** The restructuring of the OPS activity which includes the PPI, STK, ACT, and FPR will make it impossible for the Southern City #7 to accomplish this activity. This will result in an automatic penalty to the City as the current Outreach will not be valued the same. The requirements of the new OPS are beyond local government authority, i.e. creating and maintaining a committee outside the local government which includes outside stakeholders. Governmental funding constraints limit the capability to coordinate and therefore meet the requirements of the proposed activity revision. Requiring the resulting actions to be measured is not feasible. Not only having a method is not feasible, but measuring one factor alone will not give an accurate indication of the PPI; a number of outside factors can impact the intended outcome (i.e. foreclosures). It should also be noted that not having a PPI penalizes communities in multiple other activities.
- **Activity 370 - Flood Insurance Promotion:** The City currently informs residents and business owners of the importance of flood insurance through our outreach program, as well as through individual inquiries regarding flood zones and flood insurance. We do not feel asking the City to promote flood insurance through an extensive Coverage Improvement Plan to increase total coverage within the City meets the intent of local government. In addition, foreclosures are causing the number of policies to drop which is beyond the City's control.
- **Activity 430 - Development Limitations:** The new credit of Development Limitations which is proposed to be weighted at over three quarters of the credit within this activity is unfeasible

- for communities in the South to accomplish when the entire community is located within a floodplain.
- **Activity 430 - Freeboard:** Proposing to take credit away for the first foot of freeboard will be penalizing developed urban communities. Requiring more freeboard will actually create more flooding problems for adjacent properties. *French's note: That's the rationale behind extra credit for prohibiting fill – so building higher does not adversely affect others.*
- **Activity 430 - Lower Substantial Improvements:** Lowering the substantial improvement rule from 50- percent of the building's value to anything less is not reasonable in this economy. This will discourage improvements as residents and business owners will not be able to bear the cost. Although the threshold currently is maintained at 50-percent, the devaluation of houses and commercial properties has already increased the possibility of reaching the threshold. *French's note: This has been the credit for 20 years. There is no change proposed for this credit. The 50% threshold is a minimum NFIP requirement.*

General: As you can see, several of the proposed changes are expected to have a negative impact on the City and other existing CRS communities. If a community continues to perform the same activities and have the same level of involvement, the community can lose a rating class. It is understood the CRS program is an elective program and the communities participating in the program are among the top communities in the Country for floodplain management. However, in these times of economic crisis when communities are being forced to do more with less, it is unrealistic to expect municipalities to adapt to many of the proposed changes. The communities that have been participating in this program over the last decade, keeping the program afloat, are now the ones that are going to be penalized.

The proposed changes are going to discourage participation, which will have more of a detrimental effect on floodplain management. This program appears to be written for smaller communities with a limited floodplain and not for larger urban communities that are almost entirely in a floodplain. It is disappointing to see this when Florida accounts for a majority of the flood insurance policies and money paid into the Flood Insurance Program within the Country.

Thank you for the opportunity to share our concerns.

Sincerely,

Director of Community Development Department
Southern City #7

Western City #5

General

French did a great job of explaining the changes. However, things now sound way too complex and time consuming for my little city of 430 population. We only have me (the part time city clerk), a part time treasurer, and a part time maintenance worker. I have donated my time in the past to enable us to achieve a CRS rating of 6 and to become a CFM. I'm not sure that I will be able to donate as much time as this will now take. It sounds like a full time job to me and we just don't have the resources. I'm a little overwhelmed right now.

Western City #5 - City Clerk/Administrator