



ASSOCIATION OF STATE FLOODPLAIN MANAGERS, INC.

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National Policy Initiatives of ASFPM ~ 2015 Annual Report

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Here is a summary of some of the many national policy issues your association is working on. More details below. Please note the Policy and Partnerships Program Manager Samantha Medlock JD, CFM is on detail to the White House Council on Environmental Quality through the end of June 2015.

The ASFPM leadership carries messages from our members, chapters, partner organizations and disaster-impacted areas to key decision makers in Washington, DC and elsewhere as they consider what changes in national policy and programs would be effective to reduce the catastrophic consequences of the next major natural hazard disaster. We know those events will come, perhaps even more frequently and with more intensity as changes occur in development, population and climate. We believe the nation can change the consequences of such events, to show we have communities that are resilient, and even better, sustainable. That will not come easily or without leadership or debate. However, the cost in lives, suffering, and damages are far too great for us to ignore them or simply tweak existing programs or policies. Bold actions will be needed, and ASFPM will use our members' collective expertise to lead in any way we can. We ask you to join the effort in any way you are able. Here is a summary of actions during the past year.

ASFPM issues 400 recommendations of National Flood Policies and Programs. The ASFPM board reviewed and adopted this extensive list of recommendations developed by our Policy Committees and members with expertise in all areas of policy impacting flood losses and flood risk in the nation. That document is available on our website for use by members, chapters, legislators, governors, mayors, developers, the media and citizens with an interest in effectively managing flood risk.

Federal Flood Risk Management Standard (FFRMS). The president updated the Executive Order which lays out how federal agencies will protect federal taxpayer investments when undertaking federal actions in flood hazard areas of the nation. This action is long overdue, and experience demonstrates the costs of flood disasters continues to escalate as poorly protected federal investments experience repeated flooding due to increased flood levels and more intense storms and rainfall along with rising sea levels.

2012 and 2014 NFIP Reform—Congress focused on the \$19 billion debt of the 2012 bill, so many premiums were raised to put the program on better financial standing. The backlash from the rate increases resulted in the 2104 bill, which does not roll back all rate increases, but does extend the time to reach full risk rates. The premium increases were driving better mitigation decisions by individuals and communities/states, but also created political backlash. ASFPM continues to urge inclusion of a means tested voucher system for premiums, rather than rolling back true actuarial rates. Our paper on flood insurance affordability is [\(HERE\)](#).

Disaster Program Reform to promote mitigation –The House Transportation and Infrastructure Committee is holding roundtables and drafting legislation to address the high taxpayer costs for disasters. This much needed reform seems to recognize that increased investment in mitigation will be needed to reduce disaster costs. Sandy alone cost taxpayer well over \$60 billion for repair and recovery.

Technical Mapping Advisory Council (TMAC). The TMAC is now developing suggestions to FEMA for mapping, which was called for in the 2012 NFIP reform bill. It is tasked with many important items, including advising FEMA how to set priorities for mapping communities, how to do the mapping, how to incorporate future conditions into the mapping to account for changing hydrology, climate, sea level rise, etc, as well as many technical issues. The committee has a number of ASFPM members on it, with the first report due this fall.

Federal budget priorities – Federal funding drives not only what federal agencies work on, but too often which actions communities and states will address on their own because they are addicted to federal dollars or have not maintained

sufficient local/state capability. Budget realities have profound impacts on programs of importance to reducing the nation's flood risk, saving lives and protecting natural floodplain functions.

Federal agency coordination – The Mitigation Framework Leadership Group (MitFLG) was active in helping develop the guidelines for the federal flood risk standard for use of all federal grants and federal disaster assistance. These agencies are also working on collecting how much taxpayer money agencies spend on disasters, especially floods.

Building state, regional and local capability for flood risk management – This should include incentives and disincentives for ongoing actions of state and local programs that go above and beyond federal minimums to reduce or increase future risk, as well as initiatives they undertake to rebuild communities in the post-disaster environment. Proper mitigation in every phase of emergency management reduces the need and cost for future response and recovery.

Clean Water Act Reform. EPA has issued a draft rule clarifying how the Clean Water Act will be implemented in light of confusion caused by court decisions over the past few years. Over one million comments are being reviewed before the final rule is issued, perhaps this summer.

Community based flood insurance policy. The 2014 NFIP reform bill requires FEMA to ask the National Academies to research the option of selling a community based flood insurance policy. ASFPM has long supported the concept. Development decisions, bad or good, are made by the community, not the individual. If the policy was sold only to the community, and it had to insure all properties in the community, decisions to develop or not develop flood risk areas would be directly reflected in the community premium.

Flood insurance premium affordability. NFIP legislation required FEMA to have the National Academies of Science undertake a study to explore the options for making flood insurance affordable for those who truly cannot afford it, and ways to help property owners lower their premium, especially through mitigation. The first report lays out a general framework for a detailed study. The next phase of the study would identify the time frame and process and cost for a detailed study. FEMA will report to Congress on the framework.

Rating negatively elevated structures. FEMA has definite process and steps for determining the premiums for structures with a floor below BFE (100-year flood level). They have asked the National Academies to look at and evaluate their rating process for these structures and to suggest improvements. Report is due soon.

Private flood insurance. After the 2012 NFIP reform required many flood insurance premiums to move quickly to full risk rates, the private sector became interesting in entering the market to sell primary coverage for flood risk. The private sector was actively exploring the market when the 2014 NFIP reform passed which lengthened the time to reach full risk rates; sometimes to a decade or more. As such, the private sector continues to explore the market, although less vigorously than last year. A couple companies are now selling primary flood, especially in Florida.

Flood risk management – Flood disasters have had dramatic impact abroad and at home in the past few years. Natural hazard disasters resulted in billions of dollars in damages in 2012, led by Hurricane Sandy, the second costliest disaster in US. history. This followed a heavy year for disasters in 2011, when the US had a record 14 weather catastrophes costing more than a billion dollars. Only mitigation will stem this tide of increasing costs and suffering.

Flood trends in the US continue to result in increasing loss of property and resources due to development in high risk areas, changes in watershed development and more intense storms. Continuing investment of billions of dollars in high flood-risk areas, followed by billions of dollars in federal taxpayer disaster relief, means that we have not yet successfully adapted to this ever present and changing risk and have often made things worse by our human development decisions and actions.

WRRDA 2014 included some policy changes and some action on a National Levee Safety Program. ASFPM has been heavily engaged in this matter, providing testimony and continual input, including emphasizing the need for increased technical assistance to states and local governments, reforming PL 84-99, and creating a National Levee Safety Program to help reduce flood risks associated with levees. More info will be on our website as it becomes available.

ASFPM is encouraged by and has been participating in and promoting the Corps of Engineers' flood risk management program. Important activities include Silver Jackets, national levee database, and risk communication initiative. Additionally, ASFPM has initiated contacts with the US Dept. of Housing and Urban Development, EPA and DOT, specifically encouraging them to address natural hazards in their sustainability initiatives. ASFPM works closely with National Oceanic and Atmospheric Administration (NOAA) on the Digital Coast initiative and coastal NAI, and continues to partner with other agencies involved in flood risk management, including the USGS and NRCS. ASFPM meets frequently with the leadership of the Corps of Engineers, FEMA and others to discuss the flood risk policy nexus of agencies' policies and programs.

Who benefits and who pays for at risk development and disaster costs? – One question we should all be prepared to address is "WHO PAYS?" Does 94 percent of the population not living at flood risk pay the bulk of the costs for the 6 percent who do? We continue to be dismayed that some members of Congress see mapping and management of flood risk areas and restoration/utilization of natural floodplain functions for reducing flood risk as antithetical to economic development. They often use the tough economic times as further reason why we should not impose flood risk maps, regulations, or flood insurance on property owners who build, buy, or live in high risk areas - and many honestly (but erroneously) believe that those factors delay or stop economic growth! Only 6 percent of the nation's population lives at risk of flooding, but that is the people legislators hear from. All of us have a responsibility to help them hear from the 94 percent who pay for many of the costs, but receive little or no benefits. Some of these current flood policies may help a few of their constituents, but may silently hurt many of their other constituents who are not even aware of it.

The 500-pound gorilla in this mix is the post disaster federal assistance, which rushes in when flood disasters occur. These federal disaster dollars too often reward those communities and states who do little or nothing to reduce their flood risk—again and again. We encourage all ASFPM members to get involved in this dialogue. The effort to incorporate mitigation in all aspects of development and rebuilding is important not only to those living and working at risk along our rivers and coasts, but to all of us who contribute to disaster response and rebuilding efforts following disasters.

Federal budget priorities – One thing is certain in the current budget climate – there will be winners and there will be losers. The questions have become “where” and “how much” to cut? Budget requests in FY16 impact virtually all programs of importance to flood risk management including: FEMA Flood Mapping, Mitigation Programs, USGS Streamgaging Programs, USACE technical assistance Programs, NRCS Conservation Programs, and NOAA Coastal/Climate Change programs. One would think the destruction from the 2010, 2011 and especially the 2012 floods would be reminders to Congress that there is essential value to basic science, hazard identification and flood mitigation.

Flood Mapping There are proposed increases in the FEMA Flood Mapping Budget as well as the Pre-Disaster Mitigation Program. ASFPM is a leading voice in the nation highlighting the importance of flood mapping (see our [Flood Mapping for the Nation](#)) as well as mitigation programs to reduce flood losses. Getting increases will be difficult, but very worthy.

Federal agency organization and coordination – The lack of collaboration between federal agencies and programs flows from a lack of general policy direction from Congress to establish a national flood risk policy, and even beyond that, lack of an integrated and comprehensive national water policy. For example, we point out in testimony that any national levee safety policy will succeed only if done within the context of an overarching national flood risk management strategy.

ASFPM has been encouraged by the Executive Branch's recent actions. The President's Climate Action Plan initiative is important, and we work to support it—Sam Medlock is on detail there. Details on the plan can be found on their website [here](#). The MitFLG mentioned above is making a difference in building sustainable and resilient communities. The work of the Federal Interagency Floodplain Management Task Force (FIFM-TF) continues to pull together the key federal agencies to discuss integration and collaboration of programs and policies impacting floodplain management.

Building state and local capability for flood risk management – The nation's current flood risk management model relies heavily on federal, top-down approaches. However, the most effective tools in reducing future risk relies on state and local government land use, building codes, and mitigation programs. Many federal programs and policies do not build state and local capability, but continue to rely on federal top down efforts, and even worse, refuse to delegate programs to qualified states. There are few incentives in current programs to encourage states or locals to go beyond minimum federal

standards for development in high risk areas, let alone foster innovation/integration of programs in the context of future changes to achieve multiple objectives - such as improving water quality and balancing long term economic, social, environmental, or recreational objectives. States have the authority and the responsibility to reduce flood risk to existing development and to prevent the increase in future risk from new development and redevelopment. Federal agencies and all of us must work to develop policies and programs that will assist and reward those who do it right. Concepts that ASFPM has been discussing with several agencies and Congress include a sliding non-federal cost share to reward good behavior and delegation of federal programs to states that have adequate capability.

Partnerships with others – Members of ASFPM continue to be represented on groups of national policy experts, from the National Academy of Sciences Committees to strategic planning focus groups for numerous agencies and programs. We also lead and participate in coalitions that support major initiatives to advance good public policy for flood risk such as the Natural Floodplain Functions Alliance and the National Mitigation Alliance. The number of our members doing this is too numerous for us to list, but we do want to thank each and every one of them for volunteering their time and expertise. Volunteers are the backbone of ASFPM and what sets us apart from many organizations. We have literally hundreds of volunteers who spend many hours for the profession in our name, some spending perhaps hundreds of hours for the organization as their professional contribution. We do our best to recognize each of you, because without you and our committed ASFPM staff, we could not have the credibility and impact we do.

Additionally, during the past year, we have continued to engage in national policy initiatives to achieve the following:

- Inform efforts to implement the reforms of the NFIP.
- Actively engage with new federal partners on transportation, housing, and other federal infrastructure investments to identify opportunities to craft incentives, promote resilient communities, and prepare the nation for the impacts they will experience of a changing climate.
- Support needed revisions to the disaster relief act related to post disaster local permitting and mitigation
- Identify opportunities to direct federal investment in practices that incentivize and contribute to reduction of the nation's overall exposure to flood risk.
- Maintain effective relationships with inter-jurisdictional policy bodies, such as the Interagency Levee Task Force, and the Federal Interagency Floodplain Management Task Force (FIFM-TF), MitFLG, among many others.
- Engage the dam safety community and improve coordination between dam and levee risk management programs where appropriate. The need to identify dam failure zones on flood maps is one example.
- Support development and refinement of building safety standards and codes—and their enforcement. We work to promote improvements in the green codes that are optional for progressive communities to adopt.
- Deepen our ties and foster new relationships with academia, including expanding our library partnership with the Natural Hazards Center at UC-Boulder.
- Expand our ties with allied non-governmental organizations such as the National Emergency Management Association, the Association of State Wetland Managers, the Coastal States Organization, NAFSMA, IAEM, American Rivers, The Conservation Fund, The Nature Conservancy, American Planning Association and many others.
- Develop and support broad coalitions with partners who have common interests and goals, such as the Flood Mapping, Stafford Act, and USGS coalitions, as well as the Natural Floodplain Functions Alliance

All of these issues impact how citizens, communities, and states address, or do not address, flood losses and how they prepare for, mitigate, and recover from disasters, including floods. Besides this report, there is more information on our website and in our white papers, testimony, and other papers produced by our staff and member volunteers.

Your association will represent members' needs and concerns on these issues at all levels, and we will continue to seek your input and involvement in policy development. Please provide your thoughts to your ASFPM board representative and to the ASFPM executive office.

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