Community Rating System & Hazard Mitigation Planning
National Flood Insurance Program

• Passed in 1968; administered by FEMA
• Addressed market failure for flood insurance coverage:
  • Private companies offer flood insurance coverage and FEMA pays the flood insurance claims for the private companies.
  • In return, participating communities adopt and enforce floodplain management measures for all new development. Specifically:
  – Adopt and submit a floodplain management ordinance that meets or exceeds minimum NFIP criteria and that adopts community’s FIRMs (or FHBMs).
National Flood Insurance Program

• Roughly 80% of all flood insurance policies are actuarially rated.
• Meaning roughly 20% of all flood insurance policies are subsidized: Premium rates are subsidized.
• Intent of 1968 legislation was that flood insurance policy premiums would pay for program.
• Presumably did until 2004.
• Biggert-Waters 2012 & Homeowners Flood Insurance Affordability Act of 2014
Community Rating System (CRS)

- Begun in 1990
- Intended to recognize and incentivize community floodplain management activities that exceed minimum NFIP floodplain management requirements
- Earn points toward reducing NFIP flood insurance premiums.
- Class System
  - Every 500 Points = Class Reduction (from 10 → 9 → 8, etc.)
  - Every Class Reduction = 5% reduction in flood insurance premium
FEMA Hazard Mitigation Plan

• Disaster Mitigation Act of 2000 required Hazard Mitigation Plan for eligibility to receive the following non-emergency grants from FEMA:
  – Hazard Mitigation Grants Program (HMGP)
  – Pre-Disaster Mitigation (PDM)
  – Flood Mitigation Assistance (FMA)
    • Requires NFIP participation
The Regulations

- Section 201.4: Standard State Mitigation Plans
- Section 201.5: Enhanced State Mitigation Plans
- Section 201.6: Local Mitigation Plans
FEMA Hazard Mitigation Plan

- Technically, every incorporated city and every county must have a hazard mitigation plan for that city or county to be eligible for HMGP, PDM, FMA
- Multi-Jurisdictional Hazard Mitigation Plans
FEMA Hazard Mitigation Plan

• Contains the following information:
  – Planning Process
  – Hazard Identification and Risk Assessment
  – Mitigation Strategy
  – Plan Review, Evaluation, and Implementation
HMP: Planning Process

• Is there one documented? How was the process prepared? **Who was involved in the process for each jurisdiction?:** 201.6 (c)(1)

• How was the public involved during drafting stage?: 201.6 (b)(1)
HMP: Planning Process

• Opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, ...that have authority to regulate development, et al.? \(201.6\ (b)(3)\)

• Describe the review and incorporation of existing plans, studies, reports, and technical information: \(201.6\ (b)(4)\).
HMP: Mitigation Strategy

• Include goals to reduce/avoid hazards: 201.6(c)(3)(i)

• Comprehensive range of specific mitigation actions and projects for each jurisdiction: 201.6(c)(3)(ii)

• “Action Plan”: How are actions and project prioritized?: 201.6(c)(3)(iii)
510 Floodplain Management Planning

• Potentially worth 382 Points

• KEY WORDS:
  – Floodplain Management
  – Single Jurisdiction
## FEMA Hazard Mitigation Plan

### CRS 510 FMP

<table>
<thead>
<tr>
<th>FEMA Hazard Mitigation Plan</th>
<th>CRS 510 FMP</th>
<th>Maximum Points</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PHASE I: Planning Process</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>201.6 (c)(1)</td>
<td>1. Organize</td>
<td>15</td>
</tr>
<tr>
<td>201.6 (b)(1)</td>
<td>2. Involve the Public</td>
<td>120</td>
</tr>
<tr>
<td>201.6 (b)(2) &amp; (3)</td>
<td>3. Coordinate</td>
<td>35</td>
</tr>
<tr>
<td><strong>PHASE II: Risk Assessment</strong></td>
<td></td>
<td></td>
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<tr>
<td>201.6 (c)(2)(i)</td>
<td>4. Assess the Hazard</td>
<td>35</td>
</tr>
<tr>
<td>201.6 (c)(2)(ii) &amp; (iii)</td>
<td>5. Assess the Problem</td>
<td>52</td>
</tr>
<tr>
<td><strong>PHASE III: Mitigation Strategy</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>201.6 (c)(3)(i)</td>
<td>6. Set Goals</td>
<td>2</td>
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<tr>
<td>201.6 (c)(3)(ii)</td>
<td>7. Review Possible Activities</td>
<td>35</td>
</tr>
<tr>
<td>201.6 (c)(3)(iii)</td>
<td>8. Draft an Action Plan</td>
<td>60</td>
</tr>
<tr>
<td><strong>PHASE IV: Plan Maintenance</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>201.6 (c)(5)</td>
<td>9. Adopt the Plan</td>
<td>2</td>
</tr>
<tr>
<td>201.6 (c)(4)</td>
<td>10. Implement, Evaluate, Revise</td>
<td>26</td>
</tr>
</tbody>
</table>
510 FMP Differences: Plan Process

• Have office responsible for city or county’s land-use and comprehensive planning lead → ADDs

• Each city or county creates planning committee from “Step 7” Category:
  – Preventative Measures
  – Property Protection
  – Natural Resource Protection
  – Emergency Services
  – Structural Flood Control Projects
  – Public Information
510 FMP Differences: Plan Process

• Which means, have representation from:
  – Building Department/Code Enforcement
  – Engineering
  – Land-use Planning/Zoning
  – Public Works
  – Emergency Management; Public Safety
  – Public Information
  – Environmental Protection/Public Health
  – Parks/Recreation
  – Housing/Community Development
  – City Manager or Council Member
510 FMP Differences: Plan Process

• Add points if planning committee has public (unattached to local government)

• Planning Committee has to meet more than 1 or 2X
  – Assess hazard
  – Assess problems
  – Set goals
  – Review possible activities
  – Draft “Action Plan”
510 FMP Differences: Plan Process

• For multi-jurisdictional plan:
  – Each city and county must send at least 2 representatives to the planning community
    • At least two from the “Step 7” Categories
  – Half of city or county’s representatives must attend all meetings.
510 FMP Differences: Mit. Strategy
• Mitigation actions from the following categories (Step 7 Categories):
  – Preventative Activities
  – Property Protection
  – Natural Resources
  – Emergency Services
  – Structural Projects
  – Public Information
510 FMP Differences: Mit. Strategy

- MUST HAVE actions from *Preventative Activities* category:
  - Floodplain mapping and data
  - Open space preservation; erosion setbacks
  - Floodplain regulations
  - Planning & Zoning
  - Stormwater Management
  - Building Codes
  - Drainage System Maintenance

“A Team of Teams: With One Mission: Protecting our Commonwealth”
510 FMP Differences: Mit. Strategy

• But, ideally, should have actions representing all 6 “Step 7 Categories”

• Property Protection:
  – Relocation
  – Retrofitting
  – Acquisition
  – Sewer backup protection
  – Building elevation
  – Insurance
510 FMP Differences: Mit. Strategy

• Natural Resource Protection
  – Wetlands protection
  – Erosion and sediment control
  – Natural area preservation; restoration
  – Natural functions protection
  – Water quality improvement
  – Environmental corridors
510 FMP Differences: Mit. Strategy

• Emergency Services
  – Hazard threat recognition
  – Hazard warning
  – Hazard response operations
  – Critical facilities protection
  – Health and safety maintenance
  – Post-disaster mitigation actions (406 Mitigation)
510 FMP Differences: Mit. Strategy

• Public Information
  – Map information
  – Outreach projects
  – Real estate disclosure
  – Library
  – Technical assistance
  – Environmental education
510 FMP Differences: Mit. Strategy

- Structural Projects
  - Levees/Floodwalls
  - Reservoirs
  - Diversions
  - Channel modifications
  - Storm drain improvements

- Keep flood-waters away from an area
- Designed by engineers; maintained by Public Works
510 FMP Differences: Mit. Strategy

• Action Plan (Prioritizing Projects):
  – Again, KEY WORD: Floodplain Management

• PRIORITIZE ACTIONS BASED ON WHAT YOUR CITY OR COUNTY CAN DO ITSELF.

• Specifically:
  – Derive a comprehensive list of what is needed.
  – Whittle down that list into what is doable.
    • Prioritize this list by some defined criteria that includes cost effectiveness.
510 FMP Differences: Risk Assessment

• Includes assessment of less frequent floods

• Description of impact of *multiple* hazard types on:
  – Life, safety, health procedures for warning and evacuation
  – Public health, including health hazards to floodwaters/mold
  – City or county’s economy, i.e., tax base

• Description of areas that provide natural floodplain functions
Conclusion: My Opinion

• Despite its selling the use of the FEMA Hazard Mitigation Plan (HMP) as a city or county’s 510 Floodplain Management Plan, CRS can make the FEMA HMP difficult:
  – Required number of meetings
  – The necessity of including preventative activities
  – The nonexhaustive action list → exhaustive action list and its focus on city or county capability to implement
  – Annual review of 510 FMP
Conclusion: My Opinion

• But, the FEMA HMP does offer obvious efficiencies for the 510 FMP:
  – The 510 FMP still requires a *multi-hazard* risk assessment
  – Leadership of planning process by ADDs
  – That the incentives for participating in the FEMA HMP planning process are better than for the 510 CRS FMP
  – If on top of it, the option to update the FEMA HMP annually with minimal effort.
Contact Information

• Nick Grinstead, HMA Planning Manager
  – University of Kentucky Hazard Mitigation Grants Program Office (UK-HMGP)
  – nick.grinstead@uky.edu