The Community Rating System as a Tool for Coastal Resilience

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Milone & MacBroom, Inc.
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What is the Community Rating System (CRS)?

A voluntary incentive-based program that rewards communities for exceeding the minimum standards of the National Flood Insurance Program (NFIP) to help residents prevent or reduce flood losses.

Goals:

1. Reduce and avoid flood damage to insurable property
2. Strengthen and support the insurance aspects of the NFIP
3. Foster comprehensive floodplain management
CRS Rewards

- Highest premium discounts for standard policy holders in Special Flood Hazard Area (SFHA)
- Lower discounts for properties outside the SFHA

Table 110-1. CRS classes, credit points, and premium discounts.

<table>
<thead>
<tr>
<th>CRS Class</th>
<th>Credit Points (cT)</th>
<th>Premium Reduction</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>In SFHA</td>
</tr>
<tr>
<td>1</td>
<td>4,500+</td>
<td>45%</td>
</tr>
<tr>
<td>2</td>
<td>4,000–4,499</td>
<td>40%</td>
</tr>
<tr>
<td>3</td>
<td>3,500–3,999</td>
<td>35%</td>
</tr>
<tr>
<td>4</td>
<td>3,000–3,499</td>
<td>30%</td>
</tr>
<tr>
<td>5</td>
<td>2,500–2,999</td>
<td>25%</td>
</tr>
<tr>
<td>6</td>
<td>2,000–2,499</td>
<td>20%</td>
</tr>
<tr>
<td>7</td>
<td>1,500–1,999</td>
<td>15%</td>
</tr>
<tr>
<td>8</td>
<td>1,000–1,499</td>
<td>10%</td>
</tr>
<tr>
<td>9</td>
<td>500–999</td>
<td>5%</td>
</tr>
<tr>
<td>10</td>
<td>0–499</td>
<td>0%</td>
</tr>
</tbody>
</table>

Outside the SFHA: Zones X, E, C, A99, AR, and D

Preferred Risk Policies are not eligible for CRS premium discounts because they already have premiums lower than other policies. Preferred Risk Policies are available only in B, C, and X Zones for properties that are shown to have a minimal risk of flood damage.

Some minus-rated policies may not be eligible for CRS premium discounts.

Premium discounts are subject to change.
Credit Points are awarded for engaging in any of 19 activities organized under four categories:

- Public Information
- Mapping and Regulations
- Flood Damage Reduction
- Warning and Response

Numerous elements and sub-elements are found under each of the 19 activities.
<table>
<thead>
<tr>
<th>Activity</th>
<th>Maximum Possible Points</th>
<th>Average Points Earned</th>
<th>Percentage of Communities Credited</th>
</tr>
</thead>
<tbody>
<tr>
<td>310 Elevation Certificates</td>
<td>116</td>
<td>45</td>
<td>100%</td>
</tr>
<tr>
<td>320 Map Information Service</td>
<td>90</td>
<td>50</td>
<td>93%</td>
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<tr>
<td>330 Outreach Projects</td>
<td>350</td>
<td>72</td>
<td>89%</td>
</tr>
<tr>
<td>340 Hazard Disclosure</td>
<td>80</td>
<td>19</td>
<td>71%</td>
</tr>
<tr>
<td>350 Flood Protection Information</td>
<td>125</td>
<td>39</td>
<td>92%</td>
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<tr>
<td>360 Flood Protection Assistance</td>
<td>110</td>
<td>49</td>
<td>41%</td>
</tr>
<tr>
<td>370 Flood Insurance Promotion</td>
<td>110</td>
<td>0</td>
<td>0%</td>
</tr>
</tbody>
</table>
## 400 Series – Mapping and Regulations

<table>
<thead>
<tr>
<th>Activity</th>
<th>Maximum Possible Points</th>
<th>Average Points Earned</th>
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</tr>
</thead>
<tbody>
<tr>
<td>410 Floodplain Mapping</td>
<td>802</td>
<td>64</td>
<td>50%</td>
</tr>
<tr>
<td>420 Open Space Preservation</td>
<td>2,020</td>
<td>463</td>
<td>70%</td>
</tr>
<tr>
<td>430 Higher Regulatory Standards</td>
<td>2,042</td>
<td>213</td>
<td>99%</td>
</tr>
<tr>
<td>440 Flood Data Maintenance</td>
<td>222</td>
<td>87</td>
<td>89%</td>
</tr>
<tr>
<td>450 Stormwater Management</td>
<td>755</td>
<td>107</td>
<td>84%</td>
</tr>
</tbody>
</table>
## 500 Series – Flood Damage Reduction

<table>
<thead>
<tr>
<th>Activity</th>
<th>Maximum Possible Points</th>
<th>Average Points Earned</th>
<th>Percentage of Communities Credited</th>
</tr>
</thead>
<tbody>
<tr>
<td>510 Floodplain Management Planning</td>
<td>622</td>
<td>167</td>
<td>46%</td>
</tr>
<tr>
<td>520 Acquisition and Relocation</td>
<td>2,250</td>
<td>165</td>
<td>24%</td>
</tr>
<tr>
<td>530 Flood Protection</td>
<td>1,600</td>
<td>45</td>
<td>12%</td>
</tr>
<tr>
<td>540 Drainage System Maintenance</td>
<td>570</td>
<td>212</td>
<td>77%</td>
</tr>
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</table>
### 600 Series – Warning and Response

<table>
<thead>
<tr>
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<th>Maximum Possible Points</th>
<th>Average Points Earned</th>
<th>Percentage of Communities Credited</th>
</tr>
</thead>
<tbody>
<tr>
<td>610 Flood Warning and Response</td>
<td>395</td>
<td>129</td>
<td>37%</td>
</tr>
<tr>
<td>620 Levees *</td>
<td>235</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>630 Dams *</td>
<td>160</td>
<td>0</td>
<td>0%</td>
</tr>
</tbody>
</table>

* Extensively revised activities – old credits cannot be converted to the 2013 Coordinator’s Manual
Case Study – City of Milford, CT

Year-Round Flooding Potential:
- Hurricanes
- Nor’easters
- Spring Storms
- Thunderstorms & Flash Floods

City of Milford, Connecticut

The map was produced from the City of Milford Geographic Information System. The City of Milford does not guarantee the accuracy of this map. This map is not a survey and is subject to any changes as dictated by local surveys.

New Haven
4,200 parcels in SFHA
3,000 NFIP policies
$3.1 million in premiums paid annually
$1,052 per household average
$1,343 per household average in SFHA

Case Study – City of Milford, CT

Milford, East Haven top Connecticut in costly flood-prone homes
Case Study – City of Milford, CT

- **Storm Irene (2011)**
  - Flood Elevation 9.5’ to 10’
  - 520 Structures Damaged
  - 70 Substantially Damaged
  - $23M in NFIP claims

- **Storm Sandy (2012)**
  - Flood Elevation 10.5’
  - 973 Structures Damaged
  - 220 Substantially Damaged
  - $37M in NFIP claims to date
Flood Insurance Increases: BW-12 (2013) and HFIAA (2014)

- VE-14 Flood zone
- Grade at elevation 8’
- Solid Foundation
- Unfinished basement with utilities

$6,000/year to $60,000/year

What could be done?
“CRS Plan”

- **Focus**
  - Reduce Risks
  - Build Resiliency
  - Educate Constituency
  - Support Neighborhood Viability
  - Lower Annual Insurance Premiums
  - Expand Focus of Hazard Mitigation Plan
  - Will *not* become a new “Flood Mitigation Plan” under CRS
  - Instead, will be a CRS implementation and maintenance tool

- **Funding**
  - NOAA Northeast Regional Oceanic Council (NROC) Coastal Resiliency Grant of $20,000 (the maximum possible awarded sum) – later reduced to $6,500 due to funding source cutbacks
  - CT Association of Realtors picked up the balance of $13,500
Existing Class 9
- 590 points

Proposed Class 7
- Need 1,500 – 1,999 points
- 1,000 points needed

Desire to increase rating while understanding that the point spread will change under the revised CRS manual

### CRS Plan Strategy

<table>
<thead>
<tr>
<th>Series</th>
<th>Activities</th>
<th>Current Points</th>
<th>Maximum Possible Points</th>
<th>Proposed for Increased Activity in Milford</th>
</tr>
</thead>
<tbody>
<tr>
<td>300</td>
<td>PUBLIC INFORMATION ACTIVITIES</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>310</td>
<td>Elevation Certificates</td>
<td>56</td>
<td>116</td>
<td>X</td>
</tr>
<tr>
<td>320</td>
<td>Map Information Services</td>
<td>0</td>
<td>90</td>
<td>X</td>
</tr>
<tr>
<td>330</td>
<td>Outreach Projects</td>
<td>12</td>
<td>350</td>
<td>X</td>
</tr>
<tr>
<td>340</td>
<td>Hazard Disclosures</td>
<td>10</td>
<td>80</td>
<td>X</td>
</tr>
<tr>
<td>350</td>
<td>Flood Protection Information</td>
<td>24</td>
<td>125</td>
<td>X</td>
</tr>
<tr>
<td>360</td>
<td>Flood Protection Assistance</td>
<td>0</td>
<td>110</td>
<td>X</td>
</tr>
<tr>
<td>370</td>
<td>Flood Insurance Promotion</td>
<td>0</td>
<td>110</td>
<td></td>
</tr>
<tr>
<td>400</td>
<td>MAPPING AND REGULATIONS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>410</td>
<td>Floodplain Mapping</td>
<td>0</td>
<td>802</td>
<td></td>
</tr>
<tr>
<td>420</td>
<td>Open Space Preservation</td>
<td>46</td>
<td>2,020</td>
<td>X</td>
</tr>
<tr>
<td>430</td>
<td>Higher Regulatory Standards</td>
<td>107</td>
<td>2,042</td>
<td>X</td>
</tr>
<tr>
<td>440</td>
<td>Flood Data Maintenance</td>
<td>105</td>
<td>222</td>
<td>X</td>
</tr>
<tr>
<td>450</td>
<td>Stormwater Management</td>
<td>30</td>
<td>755</td>
<td>X</td>
</tr>
<tr>
<td>500</td>
<td>FLOOD DAMAGE REDUCTION</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>510</td>
<td>Floodplain Management Planning</td>
<td>91</td>
<td>622</td>
<td>X</td>
</tr>
<tr>
<td>520</td>
<td>Acquisition and Relocation</td>
<td>0</td>
<td>2,250</td>
<td>X</td>
</tr>
<tr>
<td>530</td>
<td>Flood Protection</td>
<td>0</td>
<td>1,600</td>
<td>X</td>
</tr>
<tr>
<td>540</td>
<td>Drainage System Maintenance</td>
<td>0</td>
<td>570</td>
<td>X</td>
</tr>
<tr>
<td>600</td>
<td>WARNING AND RESPONSE</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>610</td>
<td>Flood Warning and Response</td>
<td>68</td>
<td>395</td>
<td>X</td>
</tr>
<tr>
<td>620</td>
<td>Levees</td>
<td>0</td>
<td>235</td>
<td></td>
</tr>
<tr>
<td>630</td>
<td>Dams</td>
<td>51</td>
<td>160</td>
<td>X</td>
</tr>
</tbody>
</table>
Belief that potential points were left on the table

Get credit for current activities

Opportunity was well-timed with the new CRS manual

Plan identifies short-term and long-term methods of gaining additional points under 16 of the 19 CRS activities

- Capture points that can be obtained for current actions with the new CRS manual as the backdrop
- Seek additional points in the next 12-24 months
- Strive for additional points in future years
Don’t Forget the Resilience Piece!

- NOAA funding requires this viewpoint
- CRS activities are largely aligned with resilience actions and initiatives
- CRS performance metrics will help assess resilience
- Let’s look at the CRS activities one by one and comment on the potential for increasing resilience:
  - ✓ A: High potential
  - ✓ B: Good potential
  - ✓ C: Moderate potential
  - ✓ D: Not necessarily applicable
Current Level of Activity (56 of 116 points)
- ECs are maintained for permits
- Recordkeeping could be improved

Proposed Improvements
- City plans to bolster its record of ECs for pre-FIRM buildings and post-FIRM buildings (elements ECPO and ECPR, respectively)
- Work with real estate agents and insurance companies to obtain copies of ECs
Current Level of Activity (0 of 90 points)

- Numerous measures are in place to provide the public with information regarding floodprone areas
- City believes that most or all of the 90 points can be granted for current actions
- Examples provided on the next few slides

Proposed Improvements

- To ensure that the public is aware of available services:
  - Information will be posted on the City’s website directing inquiries to the correct staff
  - Annual mailer to real estate agents, mortgage companies and insurance companies notifying that they can obtain parcel-specific information from the City
320 – Map Information Services

Resilience Rating A
320 – Map Information Services

Resilience Rating A
Resilience Rating A
Resilience
Rating A
Resilience
Rating A

Log example:

Call log entry result
330 – Outreach Projects

- **Current Level of Activity (12 of 350 points)**
  - Web, direct mail, and prepared statements are all done
  - Recent car tax bill stuffer pictured to the right
  - Additional points may be available at the present time

- **Proposed Improvements**
  - **A Program for Public Information (PPI) was prepared and adopted in early 2015**
  - PPI transitions these activities to the Flood and Erosion Control Board
  - PPI should provide a multiplier for points
Current Level of Activity (10 of 80 points)

- Likely from Uniform Minimum Credit (UMC)

Proposed Improvements

- Permitting and Land Use web page contains a link that allows residents and/or potential buyers to research a property by zoning, wetlands and flood zones
- This service may immediately provide additional points
- PPI requires City to host meetings with real estate agents to discuss notifications of flood hazard and the flood insurance purchase
- PPI requires City to distribute brochures to real estate agents that advise potential buyers to investigate the flood hazard for a property
- City may consider providing additional notification to prospective buyers regarding flood-related hazards, such as erosion, subsidence, or wetland by adding appropriate disclosures to the Assessors property cards
Current Level of Activity (24 of 125 points)
  • Likely from materials filed in the library

Proposed Improvements
  • Additional materials are being filed in the library this year
  • City intends to update the Emergency Management website to include a link to real-time gage information so users can see current water levels and, where available, flood height predictions
  • City will consider making Elevation Certificates available online once Activity 310 has been improved and PDFs are available
Current Level of Activity (0 of 110 points)

- While not reflected in the current points, the City’s staff have played a significant role in providing flood protection assistance to residents.
- Additional points may be available at the present time.

Proposed Improvements

- Documentation of ongoing efforts (one-on-one assistance to property owners).
- City will develop and publicize an annual mailer that will be directed to all properties within the SFHA to notify them that staff is available to provide advice and assistance regarding flood protection.
Objective of this activity is to “improve the quality of the mapping” that is used to identify and regulate floodplain development.

At this time, the City is not seeking credit for this activity.

New FEMA mapping was completed in 2013 which increased base flood elevations in the City.

Flooding from Irene and Sandy was consistent with the FIRM.

Thus, no community support for additional increases in base flood elevations.

Future editions of the CRS plan may consider actions for activity 410.
Current Level of Activity (46 of 2,020 points)
  • Additional points are available at the present time
  • 1,573 acres of SFHA in Milford are considered dedicated permanent open space
  • Much of the open space is deed restricted (DR) and much of the open space provides natural functions (NFOS)

Proposed Improvements
  • Documentation of existing open space to gain points in the short term
  • Acquisitions of residential properties and conversion to deed restricted open space
  • City will compile an inventory of properties that may meet the criteria for natural shoreline protection (NSP) and prepare a summary for future increases in points
420 – Open Space Preservation

Resilience Rating C
Current Level of Activity (107 of 2,042 points)
- Additional points are available at the present time
- State building code recently updated
- Freeboard adoption is imminent
- Cumulative substantial damage is in place (2 times/10 years, 25% each)

Proposed Improvements
- Potential for adoption of V zone standards in coastal AE zones
- Building Code Effectiveness Grading Schedule (BCEGS) of the City needs to be Class 5 for Residential and Commercial structures to attain at least a Class 6 CRS rating
- As of 2007, the City had a BCEGS 5/4 rating
- BCEGS is currently a barrier to the City achieving a Class 6 CRS rating
- City may resolve this question and pursue the higher ratings to remove the barrier to the Class 6 CRS rating
Current Level of Activity (105 of 222 points)

- Additional points may be available at the present time
- GIS database is maintained and provides overlay maps and parcel records for staff use, as well as public use (element AMD).
- Database includes the local flood zones and identifies streets and parcels
- Hard copies of previous FIRMs are available
- Engineering Department has field-checked and surveyed 83 benchmarks (element BMM) within the City and can make this information available for engineers, architects, contractors

Proposed Improvements

- Consider development of a system that measures the rate of coastal erosion and make this available to the public (element EDM)
440 – Flood Data Maintenance

Resilience Rating C
Current Level of Activity (30 of 755 points)

- Additional points may be available at the present time
- Subdivision Regulations and Zoning Regulations already address stormwater
- Engineering Guidelines state that drainage plans shall provide on-site storage for any increase in stormwater runoff that is expected to occur due to the proposed development when analyzed for a twenty-five year storm condition; the design rainfall is to be 4.1 inches of rain over a six hour period

Proposed Improvements

- Milford plans to pursue element DS in the short term, or “design storms used in regulations”
- Zoning Regulations could be amended with a goal of incorporating best management practices relating to Low Impact Development (sub-element LID) into the regulations – this is a longer-term goal for the City
Current Level of Activity (91 of 622 points)

- Additional points may be available at the present time
- Hazard Mitigation Plan (2013) serves as the FPM
- Natural Resource Inventory (2002) provides an evaluation of significant natural resources and recommendations for preserving such resources (element NFP)
- Plan of Conservation and Development includes a detailed section ("Greenways and Greenbelts") in its Open Space chapter pertaining to preserving open space along floodplains and floodways

Proposed Improvements

- Repetitive loss properties are discussed in both the Hazard Mitigation Plan and the Plan of Conservation and Development
- However, the detailed analysis required by CRS for element RLAA has not been completed
- City will prioritize the repetitive loss properties and develop a repetitive loss analysis for at least one area
520 – Acquisition and Relocation

Current Level of Activity (0 of 2,250 points)
  • Few voluntary acquisitions have occurred

Proposed Improvements
  • Two property acquisitions are pending with HMGP funds
  • Some people in the City hope to increase the rating through additional acquisitions
  • Moving forward, the City will continue to identify opportunities to pursue acquisitions or relocations of floodprone properties
Current Level of Activity (0 of 1,600 points)

- Elevation of as many as 130+ structures has occurred at locations along the shoreline as a result of proactive homeowners and enforcement of the City’s floodplain management regulations
- Over 40 have been elevated as part of projects such as the Army Corps of Engineers and FEMA Project Impact in the Point Beach area and through FMA and HMGP
- Many of the elevations were voluntary and triggered the substantial improvement criteria only because the property owners elected to elevate structures

Proposed Improvements

- The City understands that not all of the 170+ elevations will gain points for element TUE and other elements in activity 530
- City plans to review each of the elevation projects with the goal of approaching ISO with a complete inventory of which projects will be eligible for credit under elements TUE, FPI, and PB
- The Shore Up CT program may spur additional elevations
Current Level of Activity (0 of 570 points)
- Additional points are likely available at the present time
- Public Works has commenced ten specific drainage improvement projects in SFHAs; studies are underway and construction is planned for 2015-2016
- Public Works conducts routine maintenance inspections and debris removal for catch basins, ditches and drainage ways
- Public Works website includes a link to the Public Works Service Request Form; by filling out the form, citizens can direct comments or requests to the Department for further action. These actions count toward elements CDR and PSM.

Proposed Improvements
- Stream dumping regulations (SDR) and erosion protection maintenance (EPM) may be possible
- Storage basin maintenance (SBM) for private basins is not currently feasible, although public basins can be included in an annual maintenance program
Current Level of Activity (68 of 395 points)
- Generally split between the elements for a flood threat recognition system (FTR) and emergency warning dissemination (EWD)
- All 75 points for EWD appear to be available, as EWD1 through EWD10 are possible
- City’s Emergency Operations Plan was last updated in 2013
- Everbridge is used for notifications
- Mass Notification Sirens throughout the City with an estimated range of 4,200 feet (over 2,800 parcels in the flood zone are in range)
- Evacuation signs

Proposed Improvements
- Pursue becoming a NWS Storm Ready Community (SRC)
- Prepare written procedures to meet the requirements of flood response operations (FRO) and critical facilities planning (CFP)
610 – Flood Warning and Response

Resilience Rating A

The City of Milford has 7 Mass Notification Areas throughout the city. These are one-directional areas with an estimated range of 1,225 feet. Over 26,000 parcels are in the flood zones in range of these sirens.
620 – Levees

Resilience Rating D

- No levees in Milford!
Current Level of Activity (51 of 160 points)

- Likely from Uniform Minimum Credit (UMC)
- The State of Connecticut has a strong dam safety program (element SDS) that has recently been modified through legislation and is being strengthened
- Additional points are available at the present time
Current Level of Activity (51 of 160 points)

- Portions of the City with insurable buildings are located in the dam failure inundation areas of three dams that are located “upstream”
- First Light Power and Aquarion Water Company both provide dam failure threat recognition systems (DFR) and dam failure response operations (DFO) that are spelled out in the EOPs/EAPs
- City’s Emergency Management Director has copies of the EOPs/EAPs for all three of these
- City has the ability to broadcast potential dam failure warnings to the public through the Milford Alerts notification system and other methods (DFW)
Proposed Improvements

- Under the recent State legislation, EAPs will be forthcoming for additional dams in or upstream of Milford.
- City will pursue the entry of dam failure inundation areas in the Milford Alerts notification system in order to focus on people that must be alerted of potential dam failures.
## Resilience Summary

- **10 As**
- **3 Bs**
- **3 Cs**
- **3 Ds (not applicable)**

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<td>530 Flood Protection</td>
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<td>WARNING AND RESPONSE</td>
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CRS and Resilience – A Great Team!

• CRS maintenance will provide a consistent elevated level of resilience as compared to a non-CRS community
• Financial incentives of lower insurance will increase resilience
• Higher resilience will then lead to higher CRS rating
Epilogue – when plans meet reality

- Changes in City staffing have occurred
- The Hazard Mitigation Committee will implement the plan while the Flood and Erosion Control Board implements the PPI
- The City is addressing potential violations
- There is still strong City support to utilize this plan and increase rating
- Meanwhile, other coastal municipalities are considering using the plan and the PPI