The Association of State Floodplain Managers (ASFPM) and its 25 State Chapters represent over 9,000 state and local officials and other professionals who are engaged in all aspects of floodplain management and hazard mitigation. This includes floodplain management, mapping, engineering, planning, community development, hydrology, forecasting, emergency response, water resources and insurance. All ASFPM members are concerned with working to reduce our nation’s flood-related losses. Our state and local officials are the federal government’s partners in implementing flood mitigation and insurance programs and working to achieve effectiveness in meeting our shared objectives. Our state members’ head offices that are designated by the governors to coordinate the National Flood Insurance Program (NFIP) with their communities and many others are involved in the administration of and participation in FEMA’s disaster mitigation programs. For more information on ASFPM, our website is: http://www.floods.org.

Overall, the Association of State Floodplain Managers is pleased with the budget request for FEMA in FY 2008. We particularly note the essentially full funding of the Map Modernization Initiative and the full funding (by transfer from the Flood Insurance Fund) of the two newly-authorized programs to mitigate severe repetitive flood loss properties. We also are pleased to see the request of $100 million for the Pre-Disaster Mitigation (PDM) program to restore this nationwide, competitive program to a functional level.

**FLOOD MITIGATION ASSISTANCE PROGRAM (Sec. 1366)**

The budget request includes $34 million (by transfer from the National Flood Insurance Fund) for the regular Flood Mitigation Assistance (FMA) program (Sec. 1366). The FMA supports local mitigation planning and projects to help reduce the drain on the NFIP that is attributed to flood-prone properties that are repetitively flooded or at high risk of significant damage.

It is our understanding that FEMA has determined that the authority does not exist to use premium income to support the FMA, and must constrain the amounts transferred to available funds generated by the policy service fee assessed on each flood insurance policy. FEMA’s determination is that it has the authority to use premium income only for the two repetitive loss mitigation programs (Sections 1361A and 1323, authorized by the Flood Insurance Reform Act of 2004). It is this constraint that limits the Administration’s request to an amount less than the fully authorized amount.
ASFPM urges the Committee to provide the authorized $40 million for the Flood Mitigation Assistance Program, and to clarify that the transfer for FMA may come from fee and/or premium income.

ASFPM also notes that the Administration unnecessarily constrains the FMA funds to a period of two years. The Flood Insurance Reform Act of 2004 specifically calls for these funds to remain available until expended. Many of the projects undertaken by communities involve careful planning, sensitive work with homeowners, and in some cases, lengthy construction periods (such as may be need for elevating or reconstructing homes, or floodproofing public buildings). Further, if a project comes in under budget, the unused funds should become available for use by other communities to mitigate flood damages.

The original authorization for FMA set per state and per community limitations on the amount of funds that may be provided in a five year period. With the doubling of the amount authorized for FMA, those limitations may constrain some of the states and communities that have active mitigation programs and large numbers of repetitive loss properties.

ASFPM urges the Committee to clarify that the FMA funds are to remain available until expended and that per state and per community limitations are waived.

NFIP’S PILOT PROGRAM FOR SEVERE REPETITIVE LOSS PROPERTIES (Sec. 1361A) AND INDIVIDUAL PROPERTY PROGRAM (Sec. 1323)

ASFPM is pleased to see the budget request for funding of the Pilot Program for Severe Repetitive Loss Properties (Sec. 1361A) and the Individual Property Program (Sec. 1323), which FEMA refers to as the “Repetitive Flood Claims” program. While the Individual Property Program is now operational, the regulations for the Severe Repetitive Loss programs regulations are anticipated this spring – nearly four years after authorization. It is important that FEMA and DHS issue the rules as soon as possible. FEMA has estimated that mitigation of the top-tier of repetitive loss properties can improve the stability of the National Flood Insurance Fund over the long-term, by avoiding an average of $200 million per year in claims.

The Severe Repetitive Loss program is authorized as a 5-year pilot with a termination imposed by directing that FEMA may not provide assistance after September 30, 2009. It is notable that the authorization also specifically provides that the funds shall remain available until expended. Because the program has been unduly delayed the termination date virtually guarantees that funds will not be used completely, given the length of time it takes for communities to develop projects and to prepare and submit applications, and for FEMA’s lengthy application review and approval process. In addition, a large percentage of repetitive loss properties are located in areas affected by the hurricanes of 2004 and 2005, so the availability of these programs during reconstruction remains important to help reduce future losses.

ASFPM urges the Committee to waive the termination date for the Pilot Program for Severe Repetitive Loss; the duration of the program is already limited by the amount of funds authorized and appropriated.
FLOOD MAP MODERNIZATION

ASFPM is pleased that the budget request includes $195 million for continued implementation of FEMA’s nationwide, multi-year initiative to modernize and update flood hazard maps. It is important to realize that maintaining and continuing to improve the flood maps is a long-term, ongoing process. Without adequate assessments, revisions, and maintenance, in 20 years we may find that the maps are, once again, out of date. FEMA needs to prepare for and have sufficient funds for a transition to a vibrant assessment and maintenance program when the current initiative is completed.

►► ASFPM urges the Committee to provide the full FY2008 budget request for the multi-year Map Modernization initiative.

►► ASFPM suggests that the Committee direct FEMA to report on its plans, and estimated funding needs, to transition from Map Modernization to an ongoing assessment and maintenance program.

Recently, a report entitled “Base Map Inputs for Flood Mapping,” published by the National Research Council concluded that new digital, high-resolution land elevation maps are useful in the Map Modernization initiative. The report recommends a new program called “Elevation for the Nation” and concludes that a seamless nationwide elevation dataset would not only be beneficial for flood hazard maps, but would have many other applications as well. Furthermore, the report recommends that data collected in such a program should be open source data, and disseminated to the public at no additional cost as part of an updated National Elevation Dataset.

While ASFPM agrees that more accurate ground elevation data will improve the utility of the FEMA flood maps, we are concerned that such an effort could shift resources from Map Modernization. Map Modernization is focused on creating the flood data layer – information pertaining to the extent and depth of floodwaters along our coasts, rivers, streams and other bodies of water. Even with that focus, there are not enough resources to develop the flood data layer as robustly as communities need to manage present and future flood risks. ASFPM would be supportive of a separate initiative, under the leadership of the U. S. Geological Survey, to implement “Elevation for the Nation.”

PRE-DISASTER MITIGATION GRANTS

Last year, an independent study of the benefits of mitigation, requested by Congress, was completed by the National Institute of Building Sciences. The report found an overall benefit-to-cost ratio of 4 to 1 for mitigation investments. For flood mitigation, the benefit-to-cost ratio was found to be even greater, with benefits of $5 for every $1 invested. Clearly these mitigation projects are important in the nation’s efforts to reduce future flood losses.

Nationwide, interest in mitigation has never been higher. As a result of the Disaster Mitigation Act of 2000, communities throughout the nation have developed local hazard mitigation plans which identify specific mitigation actions. Collectively these plans identify large numbers of mitigation actions – including many that will be supported solely by local funds, as well as many that will be eligible under PDM and other FEMA grant programs. To preserve this interest and momentum, even in areas of the country that have not experienced a recent disaster, the Pre-Disaster Mitigation Program should be funded as requested.
ASFPM urges the Committee to provide full funding of the Administration’s budget request of $100 million for the competitive Pre-Disaster Mitigation Program.

PROMISING FEMA INITIATIVES

Flood Control Levees: Although a national dialog between FEMA, the Corps of Engineers and key stakeholders had been taking place regarding flood protection levees, the issue was thrust into the forefront after Hurricane Katrina. The levee failures in New Orleans, in addition to issues related to FEMA’s Map Modernization initiative and the need to recertify the level of protection of levees, has required FEMA and the U.S. Army Corps of Engineers to collaborate closely on levee issues. This renewed dialog appears to be vigorous and ASFPM is hopeful it will bring long-lasting results to improve the public’s awareness of the benefits and the risks of levees. We support an improved program for the Corps to develop a levee inventory and work with FEMA and stakeholders to develop standards and guidance for properly operating and maintaining levees.

Improved Mitigation Grant Processes: In recent years FEMA has worked to improve its mitigation grant review and approval process, yet it continues to take as long as 12 to 18 months in some instances. States and communities report that sometimes the process can be frustrated at the FEMA Regional Office level by multiple reviews and redundant requests for information and data. It is also frustrating that FEMA has declined to provide feedback on specific weaknesses of applications (much less suggestions for improvement) that were submitted for the competitive Pre-Disaster Mitigation grant program. We are pleased that FEMA National continues to seek ways to improve the process, including its initiative to “unify” grant programs and tools where possible. Although this initiative is just beginning, ASPFM is encouraged by FEMA’s stakeholder based approach.

All of FEMA’s mitigation grant programs require an analysis of benefits and costs to ensure that mitigation dollars are providing a return on investment to the taxpayer. Given that the aggregate of FEMA’s mitigation grant programs, on average, approaches $500 million nationwide, it is imperative that the tools for benefit-cost analyses are accurate, updated, and user friendly. In 2007, FEMA kicked off an initiative to update these tools. ASFPM is supportive of this effort.

NEW FEMA, STAFF VACANCIES, AND DHS REDUCTIONS

This past fall, Congress passed the Post Katrina Emergency Management Reform Act which sought to restore FEMA by transferring preparedness functions back into the agency and limiting the Department of Homeland Security’s interference in FEMA’s programming and budgeting. In the past few months, FEMA Director Paulison unveiled a vision for a “New FEMA.” This vision focuses on core competencies, increased staffing to a level appropriate to fulfill such core competencies, and strengthening FEMA’s regional offices. While we are encouraged by FEMA’s initial plans, it will be critical that Congress continue close oversight to ensure that FEMA is, indeed, restored with the autonomy and adequate resources and staffing to undertake the responsibilities Congress has established.

For information about ASFPM and this testimony, contact Larry Larson, Executive Director, at (608) 274-0123 (asfpm@floods.org) or Merrie Inderfurth, Washington Liaison, at (703) 448-0245 (inderfurth@aol.com).