July 8, 2008

Honorable Saxby Chambliss
416 Russell Senate Office Building
Washington, DC  20510

Honorable Johnny Isakson
120 Russell Senate Office Building
Washington, DC  20510

ATTN: Bill to Reauthorize the Pre-Disaster Mitigation Grant Program (S. 3175)

Dear Senator Chambliss and Senator Isakson:

The Georgia Association of Floodplain Management (GAFM) has been watching with interest for some time the bill to reauthorize the Pre-Disaster Mitigation grant program (S. 3175). That bill is likely to be brought before you on the Senate floor in the very near future. While we strongly support the Pre-Disaster Mitigation program (PDM), an amendment adopted in committee would undermine the purpose of the program and inappropriately involve the Federal Emergency Management Agency (FEMA) in work that is the responsibility of the U.S. Army Corps of Engineers (USACE) and the Natural Resource Conservation Service (NRCS). Specifically, GAFM is opposed to any amendment that would make flood control projects eligible for funding through FEMA’s PDM program. GAFM is a two-year old non-profit organization dedicated to forwarding the cause of sound floodplain management within the state of Georgia. We are one of the 27 chapters of the national Association of State Floodplain Managers (ASFPM), comprising 12,000 individual and chapter members.

GAFM supports programs designed to mitigate flood losses. We work as partners with ASFPM and other agencies toward that objective. We believe that both structural flood control measures (such as levees and dams) and non-structural measures (such as land use and planning, building codes, elevation of buildings,
buy-outs, floodproofing of individual buildings) are tools that can be used in reducing flood related damage.

We believe that Congress has, in the past, appropriately funded structural flood control measures through programs of the USACE and NRCS. Congress has designated FEMA to provide support for the community based non-structural measures noted above. Since its inception, community demand for Pre-Disaster Mitigation grants to assist with cost-effective non-structural projects has far outstripped the funds available.

The amendment adopted last week by the Senate Homeland Security and Governmental Affairs Committee during mark-up of S. 3175 makes structural flood control projects eligible for funding through FEMA’s PDM program. Structural flood control projects are currently ineligible through the PDM program. The amendment defines such projects as including:

1. A project relating to the construction, demolition, repair or improvement of a dam, dike, levee, floodwall, seawall, groin, jetty or breakwater;

2. A waterway channelization, or

3. An erosion project relating to beach nourishment or renourishment…”.

It was our understanding that one of the purposes of the Office of Homeland Security was to avoid duplication of efforts in the agencies that it administers. This amendment to the PDM program opens FEMA’s responsibilities to areas that have not been and should not be its task. We urge that Congress not establish duplicate responsibilities and programs in different agencies. In this case, the USACE and NRCS have the staff and procedures to address structural projects, while FEMA has none of that capability. FEMA would thus have to spend tax monies to develop capabilities that already exist in the USACE and NRCS.

We certainly understand the desire and the need to help communities address their levee problem. However, we strongly believe that to open FEMA’s mitigation programs to structural flood control projects is unwise public policy. In the recent Iraq Supplemental bill Congress has provided robust authorities and appropriations (hundreds of millions) to USACE and NRCS to assist in repair of levees and other structural flood control works, funds under the Public Assistance program of the Disaster Relief Act, as well as the provisions of PL 84-99 where USACE repairs many local levees at 100% federal costs. There are also ongoing authorities in USACE and NRCS for structural works. Finally the USACE has been given additional authorities and oversight of levees in the 2007 Water Resources Development Act (WRDA), which establishes a levee safety program that is overseen by the USACE.

Structural flood control costs for single projects often exceed the entire PDM annual national appropriation (in FY 08 the appropriation averaged less than $2 million/state), so adding structural measures as eligible projects under PDM will immediately overwhelm this program. The PDM program could actually assist many communities with non-structural projects so they are not devastated in the next flood--provided the program is not diverted to other communities for projects that should and could be funded by USACE and NRCS.

It should be noted that the 2008 Midwest flood would have been much worse were it not for the 12,000 plus buyouts and elevation of buildings in high risk flood hazard areas that FEMA accomplished after the 1993 Great Midwest floods using FEMA’s non-structural mitigation programs. There are many stories circulating in the media about some of the successful non-structural
projects that occurred such as the buyout and relocation of the entire communities of Valmeyer and Grafton, Illinois. Neither is experiencing a fraction of the problems and damage this time around. Paul Osman of the Illinois Department of Natural Resources – Office of Water Resources in Springfield, Illinois can provide much needed information and dollar figures on the damages that were avoided in Illinois during the recent floods by PDM funds being used for non-structural projects. Illinois’ success story is but one of many nationwide due to the successful implementation of the PDM program.

While there are those who feel the amendment is not harmful because it caps structural projects at 25% of the funding, it is important to realize if 25% of the funds are diverted to structural projects, there will be many communities who will not obtain funding for well planned and cost effective non-structural projects.

In summation, we wish to strongly emphasize that the communities of our nation are following the dictates of the Disaster Mitigation Act of 2000, which required the development and adoption of local hazard mitigation plans to qualify for grants. Their efforts are now coming to successful completion. The number of communities now eligible for PDM funds will increase by several hundreds, if not by thousands. The amendment to S. 3175 will redirect the available PDM funds inappropriately; just as communities have finished the requirements to begin application for projects their citizens have helped plan and support.

GAFM represents over 350 individuals 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 management and insurance. For more information on GAFM, please feel free to visit our website at www.gafloods.org.

We would appreciate your vote against the amendment to make structural flood control projects eligible for funding through FEMA’s PDM grant program.

Thank you for your time and for your service to the great State of Georgia.

Sincerely,

Terri L Turner, AICP, CFM
GAFM Chair