July 2, 2008

We, the Illinois Association for Floodplain and Stormwater Management (IAFSM) Board, have been made aware of the current bill to reauthorize the Pre-Disaster Mitigation grant program (S. 3175) which is likely to be voted on by the Senate shortly. While we strongly support the Pre-Disaster Mitigation program (PDM), we believe that an amendment, adopted in committee, will undermine the purpose of the program. It will inappropriately involve the Federal Emergency Management Agency in work that is and has been the responsibility of the U.S. Army Corps of Engineers (USACE) and the Natural Resource Conservation Service (NRCS).

We believe that Congress has, in the past, appropriately funded structural flood control measures through programs of USACE and NRCS. Congress asks FEMA to provide support for the community based non-structural measures. 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 makes structural flood control projects eligible for funding through FEMA’s PDM program. Such measures are currently ineligible. 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…”.

We thought that one of the purposes in creating the office of Homeland Security was to avoid duplication of efforts. 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. The USACE and NRCS have the staff and procedures to address structural projects, while FEMA does not. FEMA would have to spend tax monies to develop the capabilities that already exist in the USACE and NRCS.

We certainly understand the desire to help communities address their levee problems. FEMA's mitigation programs do not seem to us to be the best programs for structural flood control projects and we consider such use to be unwise public policy. Structural flood control costs for single projects often exceed the entire PDM annual national appropriation. 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.

We in Illinois were proud that the 2008 Midwest floods could have been much worse were it not for the buyouts and elevation of buildings in high risk flood hazard areas. This was accomplished by our State and Local Floodplain Managers 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. You may contact Paul Osman of the Illinois Department of Natural Resources - Office of Water Resources in Springfield for more information on the damage not done by the 2008 flooding.

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. This amendment 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.

We would appreciate your standing up for the many State and Local Floodplain managers of this State and vote against this amendment. Thank you for your time and for your service to our great State of Illinois.

Sincerely,

E. Stuart Richter, CFM, Chair
Illinois Association for Floodplain and Stormwater Management