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***Federal Interagency Floodplain Management  
Task Force***

**ASFPM RECOMMENDED TASK FORCE ACTIONS**

The ASFPM is encouraged the federal agencies are once again meeting jointly to engage in dialogue on the cross cutting policies and programs that can reduce flood losses or flood risk in the nation, or may inadvertently increase those flood losses and flood risk if not coordinated or integrated. The purpose of this paper is to provide suggestions to the FIFM-TF for consideration and action. We are limiting our suggestions to issues that cross policies or programs of more than one federal agency. Our overarching priority recommendations are:

1. *Make the Task Force a permanent group that meets regularly and develops a long range strategy and yearly work plans.* Historically, the Interagency Task Force helped set the tone for floodplain management policy and programs in the nation and was an incubator looking both back and forward. This constant presence was a shaping force for managing floods in the nation during the 1970's, 80's and 90's. An active Task Force, engaged with state and local partners, can again accomplish that for the nation into the future.
2. *Update the Unified National Program for Floodplain Management.* The (UNP) documents served as critical benchmarking for activities, but more importantly served as a focal point for interagency dialog and collaboration. There is a need to focus on the reissuance of a new UNP that is not just on an update, but an evaluation and articulation of how a national program for comprehensive flood risk management incorporating natural resources and functions should be organized and implemented.
3. *Update the 1992 National Assessment of Floodplain Management in the U.S.* This document went into a much broader look at a variety of programs and activities and is in need of an update to reflect current approaches that have evolved in the last two decades.
4. *Address the federal leadership actions on the following page, which are broad policy actions that need urgent consideration by the Task Force.* Many of the other policy and program recommendations on the following pages would be addressed in development of the above two critical documents.

If ASFPM can be of further assistance, or can provide further explanations, please contact Larry Larson, ASFPM Executive Director at (608) 274-0123 or [Larry@floods.org](mailto:Larry@floods.org)



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## ASFPM SPECIFIC RECOMMENDATIONS TO FIFM-TF

The chart on the following pages lists recommendations of ASFPM on the range of federal policies and programs that relate to floodplain management in the United States. These are some excerpts from programs and policies that are reviewed in depth in the ASFPM's report *National Flood Programs and Policies in Review—2007* (NFPPR). Note that the statements listed here are shortened versions of the ASFPM recommendations. The complete descriptions, discussion, and pertinent background information can be found on the pages of the report noted in the middle column. The full 2007 report itself can be accessed at [http://www.floods.org/PDF/ASFPM\\_NFPPR\\_2007.pdf](http://www.floods.org/PDF/ASFPM_NFPPR_2007.pdf)

The Right hand column is our understanding of the primary agencies that would be involved in addressing that particular policy, program or procedural area. In instances where we noted Congress or the Administration action is probably needed, we urge the FIFM-TF to shape and suggest the appropriate action that either of those entities might consider. Sometimes that may be a listing of options to address a particular need or issue. It is difficult for Congress to understand the implications or pros and cons of a particular action without the analysis of the agency experts. This will greatly assist them in making informed decisions with long term benefits to the nation.

<b>ASFPM Position/Recommendation</b>	<b>p. # in NFPPR</b>	<b>Entity Responsible for or involved in Action</b>
<b>1. Federal Leadership</b>		
1-1 Establish a National Floodplain Management Policy	21	Congress, Administration, FIFM-TF
1-2 Reinvigorate EO 11988 and evaluate compliance to ensure 500-year protection for critical facilities; ensuring access and operation of facilities during 500-year flood; avoiding floodplain when possible; using future conditions in decision making; avoiding adverse impacts	23, 78	All federal agencies, with leadership by FIFM-TF
1-3 Issue new floodplain management EO with stronger mechanisms for enforcement and accountability	23	Administration-FIFM-TF
1-4 Perform analysis of all agencies programs and policies that inadvertently encourage or contribute to increased flood losses and/or flood risk		FIFM-TF or individual agencies
1-5 Appoint a Presidential or Congressional commission to assess major shifts needed in national flood risk management	6	Administration, Congress, FIFM-TF
1-6 Consider shifting to a national model that delegates floodplain management authority and responsibility to states, with incentives and disincentives	6	Congress, Administration, states
1-7 Provide incentives/disincentives to encourage states to issue strong executive orders on floodplain management, and penalties if all state programs are not subject to the EO	15	Federal agencies, Congress, states
1-8 Enforce appropriate restrictions on federally leased floodplain land—no grants/disaster funds—full insurance	13	Congress, Corps, other federal agencies

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<b>2. Economic Methods and Policies</b>		
2-1 Revise <i>Principles and Guidelines (to Objectives, Principles and Standards)</i> to include public safety and sustainability; promote non-structural approaches, account for all benefits; require protection and restoring the functions of natural systems; change NED concept to national economic sustainability	27	Administration, all impacted federal agencies
2-2 Ensure that those who build and live at risk of flooding pay their fair share of the costs of living at risk		Congress, Administration, federal agencies
2-3 Those who benefit from at risk development should pay the long term cost of flood damages, and not be able to externalize future flood damage costs to others, which is usually the federal taxpayers and those not living at risk		Congress, Administration, federal agencies
<b>3. Flood Risk communication</b>		
3-1 Improve public awareness of flood risks and natural resources and functions and the need for preparedness, and evacuation in riverine and coastal hazard areas using current social science research findings and recommendations	65	All Federal agencies, lead by FEMA, USACE, NOAA, states, professional groups
3-2 Provide incentives/funding for public outreach on flood risk and insurance, especially for communities with levees and other residual risk areas	93	Administration, Congress, states
3-3 Clearly communicate flood risk on maps; uncertainty in forecasts, better terminology; awareness campaigns	11, 38, 40, 82	Federal agencies, states, locals, private sector
<b>4. Partnerships &amp; Incentives</b>		
4-1 Provide incentives for the acceptance of responsibility for flood risk by citizens, states, communities, private sector	11	Administration, Congress, states
4-2 Amend Disaster Relief Act to apportion costs, responsibilities, roles among fed, state, locals, public commensurate with risk and to provide better cost share for all programs that provide post disaster assistance to those who do more to prevent and reduce at risk development	11	Congress, Administration, federal agencies
4-3 Create financial incentives/disincentives for communities, such as: basing all federal flood-related assistance to states and localities on a sliding cost-share: the more mitigation, the smaller the non-federal share; nonstructural measures should always get a larger federal share since there is no federal obligation for future O&M	13, 24, 45, 79	Congress, federal agencies, states
4-4 Award increased Public Assistance to communities that meet national standards for infrastructure (once set) <i>see 13-1</i>	12	Congress, FEMA, other federal agencies
4-5 Encourage market-driven private-sector incentives for mitigation and funding for infrastructure	13	Congress, all federal agencies, Administration
4-6 Deny subsidized assistance for public infrastructure that would encourage development in floodprone areas	13	Administration, Congress, FEMA

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<b>5. Building State &amp; Local Capability</b>		
5-1 Develop, fund, and implement technical and financial support and other incentives for localities to conduct their own management and mitigation programs	16, 17, 19	States, all federal agencies
5-2 Provide incentives to encourage communities to integrate floodplain management with land use, watershed and conservation plans	16	Federal agencies, states, Congress
<b>6. Disaster Management &amp; Assistance</b>		
6-1 For flood disasters, make disaster assistance contingent upon NFIP participation, compliance, and maintenance of flood insurance for private and public facilities	13, 80, 81, 84	Congress, Administration, FEMA
6-2 Expand the Emergency Management Assistance Compact to cover the mitigation and recovery phases, including substantial damage and permit actions	15, 84	Congress, states
6-3 Establish a comprehensive set of emergency rules for funding, cost-sharing, and priorities so federal programs after a disaster are consistent	81	All federal agencies, states
6-4 Ensure that actions undertaken pursuant to emergency action plans do not cause adverse flood impacts on other properties or communities	83	FEMA, other federal agencies, states
6-5 Review PA and IA for consistency with EO 11988	81	FEMA
<b>7. Individual Accountability</b>		
7-1 Base receipt and amount of disaster assistance to individuals on the extent to which they mitigated and/or insured their flood risk (limit free bites)	12, 14	Congress, FEMA, states
7-2 Discontinue practice of waiving the flood insurance requirement after issuance of LOMRs; apply risk-based rates instead	14, 38, 49, 86	FEMA
<b>8. Climate Change</b>		
8-1 Evaluate vulnerability of U.S. population centers to climate change with regional climate studies	22	NOAA's SARR, HUD, FEMA, NAS
8-2 Support/participate in data collection & analysis on impacts of climate change with regional research data	22	All federal agencies, states
8-3 Include analysis of impacts & adaptations to climate change in all-hazard mitigation plans and flood maps	23	FEMA, states, communities
8-4 Ensure consideration of climate change impacts in agency compliance with Executive Orders	23	Administration, all federal agencies
<b>9. Floodplain Natural Resources/Functions</b>		
9-1 Initiate a national study on environmental degradation that results from water resources development and the impact of degradation on the economy	31	Administration, Council on Environmental Quality

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9-2 Collect and build database of floodplain resources and functions so the nation has a baseline and can measure future losses and impacts of their loss		EPA, NRCS, NOAA, FEMA, USACE, DOI, FWS
<b>10. Coastal Issues and beach nourishment</b>		
10-1 Improve coordination among all federal agencies and coastal states of coastal zone management, floodplain management, and emergency management	73	NOAA, FEMA, Corps, NRCS, DHS, other federal agencies, and states
10-2 Develop guidance to determine if or when beach re-nourishment is in the federal interest, and if no federal interest do not provide federal funds for any projects	69	Administration, Congress, National Research Council, fed agencies and states
10-3 Do not use beach nourishment in any federally funded projects, unless federal interest can truly be shown	69	Congress, all federal agencies, states
<b>11. Agriculture Policies</b>		
11-1 Increase funding for popular and effective agricultural conservation programs that buy permanent easements to protect floodprone lands and resources	61	Administration, Congress
11-2 Integrate agriculture programs with flood loss reduction and floodplain management and flood risk mgt programs	61	All federal agencies, states
<b>12. Mitigation</b>		
12-1 All mitigation projects must prevent adverse flooding impacts on others now & future; require No Adverse Impact approach in state and local mitigation plans and in CRS; produce guidance and incentives to encourage incorporation of no adverse impact in state/local planning requirements.	10,15, 19, 48, 51-53, 68,77, 81, 83	All federal agencies, FEMA, USACE, NOAA, states
12-2 Train PA and IA field staff to promote mitigation in all post disaster federally supported actions and incorporate these opportunities into all-hazards mitigation plans <i>Also see Sec 6</i>	47	FEMA
12-3 Eliminate B/C requirement for repetitive loss structures		FEMA and/or Congress
<b>13. Infrastructure &amp; Public Buildings</b>		
13-1 Develop national standards for the location, design, construction, and reconstruction of infrastructure (including roads, bridges, and railroads) and include requirement for consideration of alternative locations	12, 77	All federal agencies, states, key Professional NGOs such as ASCE, APWA, ASFPM, etc.
13-2—Ensure all infrastructure supported with any federal funding is sustainable in accordance with Fed Ex. Order		All federal agencies, supported by Executive order and regs
13-3—Define critical facilities and require they be located outside the 500 year floodplain, or if impractical, protected to and accessible and operable in the 500 year flood event. No federal funding if do not meet this criteria.		All federal agencies, supported by Executive order and regs

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<b>14. Structural Projects</b>		
14-1 Build all structural measures to 500-year protection if any federal investment and for insurance, regardless of B/C analysis	49, 52	Congress, White House, federal agencies
14-2 Prevent or mitigate any adverse impacts (physical, social, economic, environmental) from construction, repair, rehabilitation of structural projects before construction	51, 52	All federal agencies
<b>15. Flood Insurance (options for consideration)</b>		
15-1 Require private homeowners insurance to cover all natural hazards, including flood—end federal flood insurance		Congress, FEMA
15-2 Require flood insurance in 100- and 500- year floodplains, storm surge zones, and residual risk zones associated with structural projects (preferred risk rates for RR)	39, 53, 55, 56, 91	Congress, FEMA
15-3 Tie availability of disaster assistance to compliance with NFIP at local and state level (at least sliding cost share)		Congress, Administration
<b>16. Data &amp; Technology</b>		
16-1 Provide funds for collection of basic data needed to manage flood risk, (e.g. streamgages, loss/insurance data, etc) NOAA Digital Coast data and web site is good example	23, 33, 58, 82	Congress, states
16-2 Place all data collected post-disaster (including NFIP claims, PA & IA information) in public domain and accessible to states, localities & stakeholders; in real time	34, 35, 81	All federal agencies & contractors
16-3 Build nationwide database on number of floodprone structures, all dams & levees, population at risk of flooding	34, 54	Corps, FEMA, NRCS, NOAA, states
<b>17. Flood Maps</b>		
17-1 Depict failure zones associated with dams, levees, diversions, and reservoirs on flood maps, and display other special hazards (ice jam, flash flood, closed basin, debris flow, alluvial fans, subsidence, etc) on flood maps	39, 53, 55, 56, 90	FEMA, states
17-2 No longer use flood maps for flood insurance but develop better way to assign flood risk for insurance purposes, (such as turning flood insurance over to private sector) then use flood maps for planning/management of flood risk	38, 90	FEMA, Congress, Administration
<b>18. Hydrology</b>		
18-1 Incorporate Future-conditions hydrology (include development and changing storm patterns) and cumulative impacts into flood risk determinations under the NFIP and other agency programs	35, 50, 39, 77	FEMA, USACE, DOT, NRCS, DOI, EPA
18-2 Fund updates of and complete National Weather Service regional rainfall frequency curves	35	Congress, NWS, USGS