The Association of State Floodplain Managers welcomes the opportunity to comment on the FY 2013 budget request for the Federal Emergency Management Agency. Specifically, our testimony will focus on the proposed budgets for flood risk mapping ($89.3 million), for Pre-Disaster Mitigation (PDM) ($0), for mitigation programs of the National Flood Insurance Program ($120 million) and for a new National Preparedness Grant Program (NPGP) ($1.5 billion).

The FY 2013 FEMA budget request is a mixed bag for hazard mitigation programs, including additional significant cuts to flood mapping, elimination of FEMA’s only all hazards pre-disaster mitigation program, but increases in grants for some flood mitigation programs. Overall, however, the budget reflects a continued downward trend in the focus on hazard mitigation programs.

Dedicated to reducing flood risk and losses in the nation.
Natural disasters in 2011 were record setting, with fourteen events in the United States estimated to have caused over $1 billion in damage. Four of those were flood events only and others involved significant flooding. This is the continuance of a trend of increased damages caused by flooding that has been occurring for over a decade. Flood damages have jumped from $6 billion per year in the 1990s to nearly $10 billion per year in the 2000s. Unfortunately the trend has been moving away from investment in hazard mitigation programs that assist communities to become more resilient following disasters.

Flood Hazard Mapping

Flood hazard mapping is the foundational piece of hazard mitigation. Not only does it provide data for hazard mitigation plans and projects but it also provides data for the general public to understand flood risks, and information for the implementation of local land use requirements and building codes. With the changing nature of flood risks and the significant backlog of needed mapping (Some areas of the country still have flood maps over 30 years old and some have never been mapped and/or lack engineering data.), the reduction in flood mapping funds from $220 million in 2010 to $89 million proposed in 2013 will only delay our identification and understanding of the risk faced by many Americans. Furthermore, there are demands by the public and Congress that flood mapping be made more accurate especially in areas protected by levees. FEMA’s ambitious new flood mapping program, Risk MAP may now be significantly less effective should the mapping program support not be restored to prior levels of $200 million or more.
While the Association of State Floodplain Managers acknowledges all budgets in the Federal government will likely be reduced to some extent, the disproportionate reduction in flood mapping funds makes little sense for a hazard that is the most frequent and one of the most costly in the United States. Mapping should be funded at earlier levels because communities need these maps to know where their risks are so they can take action to mitigate their risks, and thereby reduce the national risk.

**Elimination of Pre-Disaster Mitigation (PDM)**

Even more perplexing is the proposed elimination of the Pre-Disaster Mitigation (PDM) program. This program has resulted in numerous successes such as over 18,000 communities having developed and adopted hazard mitigation plans and all-hazard “sticks and bricks” mitigation projects being implemented that have permanently reduced future risk by getting existing, at-risk development out of harm’s way. It allowed states that didn’t have frequent disasters to tap into hazard mitigation resources to reduce their risks too. PDM is the pre-disaster complement to the Hazard Mitigation Grant Program (HMGP) that is triggered only after a federal disaster declaration.

ASFPM is very concerned about the effect of the elimination of PDM on hazard mitigation planning. Approximately 20% of PDM funds have been used to support the hazard mitigation plans of states and communities required by the Disaster Mitigation Act of 2000. These plans are required for eligibility for post-disaster mitigation assistance and are key to effective expenditure of mitigation funds. Further, it is unclear where future funds will come from to support ongoing mitigation plan updates.
PDM, which provides resources before an event happens as opposed to afterwards, is widely considered to be a successful program despite acknowledged problems with timely obligation of funds. **ASFPM recommends that the Administration could and should look to models which would delegate the program to states to ensure obligation of funds will happen much more quickly.** Since PDM was first funded (FY 2003), $87,443,580 has been allocated toward requests from state and local governments for completion of 967 hazard mitigation plans. During that same time period, $486,319,202 has been allocated for implementation of 532 cost-effective hazard mitigation projects. The return on this investment is projected to be at least $1.95 billion based on the analysis of hazard mitigation costs and benefits conducted by the Multi-Hazard Mitigation Council (this report shows that investments in FEMA’s hazard mitigation programs yield on average $4 in benefits for every $1 invested. For flood disasters, the ratio is $5 in benefits for every $1 invested). Also, these programs are cost shared with states and communities ensuring that they, too, are investing in their future resilience from hazards. **ASFPM recommends retention of the program at least at the minimal FY ’12 funding level of $35.5 million.**

**Creation of new NPGP**

ASFPM also cautions the Administration to thoughtfully proceed with the creation of a large multi-purpose grant program which folds together 16 grant programs ranging in focus from terrorism preparedness to natural hazard mitigation. Inclusion of mitigation as an eligible activity is the rationale for elimination of PDM. However, the “vision” document for this program clearly shows priorities are focused on funding activities that are not mitigation, and under the proposed framework mitigation priorities
will, in reality, be all but impossible to fund. Ultimately the National Preparedness Grant Program (NPGP) and National Preparedness Goal are aimed at readiness, not mitigation. While mitigation is a component of readiness (as it is a component of response and recovery) readiness is not a substitute for mitigation. ASFPM recommends that implementation of a new NPGP be delayed to allow for consultation with stakeholder groups. As presently envisioned, the program is likely to result in neglect of key functions of mitigation and resilience.

Increase in Funding for Mitigation Grants of the National Flood Insurance Program
ASFPM is very pleased that the Administration has proposed increasing its investment in flood mitigation programs under the NFIP – from a funding level of $60 million in FY ‘12 to proposed FY ‘13 funding of $120 million. These programs are largely, but not entirely, focused on properties which file repetitive flood loss claims. ASFPM notes that the budget assumes a streamlining of the Flood Mitigation Assistance Grants, the Severe Repetitive Loss program and the Repetitive Flood Claims program to achieve greater efficiencies. The greater commitment to elimination of repetitive loss properties from the National Flood Insurance Program is important to the NFIP’s financial integrity.

About ASFPM
ASFPM and its 33 Chapters represent over 14,000 state and local officials and other flood risk professionals—website: http://www.floods.org. For any further questions on this testimony contact Larry Larson, ASFPM Executive Director, at larry@floods.org or 608-274-0123 or Meredith Inderfurth, ASFPM Washington Liaison, at 703-448-0245.