



Association of State Floodplain Managers, Inc.

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October 6, 2010

The Honorable Craig Fugate
Administrator
Federal Emergency Management Agency
500 C Street SW
Washington, DC 20472

Dear Administrator Fugate:

The Association of State Floodplain Managers (ASFPM) totally supports FEMA's Community Assistance Program – State Support Services Element (CAP-SSSE). This program provides, through agreement with the States, a means to ensure that over 21,000 communities participating in the National Flood Insurance Program (NFIP) are in compliance with NFIP requirements and achieving the flood loss reduction goals of the NFIP.

In past fiscal years, the CAP-SSSE funds were not distributed to the states until well into the 2nd quarter, and some states did not receive their CAP-SSSE funding until the 3rd quarter. It is our understanding these delays may be caused by both the financial process through which FEMA receives its funding, or by delays in getting the funds to the States after the Regions are sent the funding from Headquarters. These delays had a significant impact on the ability of state programs to assist the NFIP in important activities. A delay in funding into the second and third quarters exacerbates the challenges of planning for state match amounts.

Due to many states' budget constraints, travel by state staff to conduct CAP-SSSE activities was curtailed or stopped. In addition, some states indicated that they had to consider layoffs of experienced staff that perform the CAP-SSSE activities within the state due to the federal funds designated for this purpose not being received in a timely manner.

As you are aware, with shrinking state revenues and the use of more state budget control mechanisms, most states do not have the same flexibility that they once had to "carry" or "float" delayed federal funds when payroll and staff expenses are incurred. Most states have switched to a more centralized budget process and management. Their programs must accurately project their quarterly needs for personnel, equipment, travel, and supplies. When allocations are not used for the intended match, the unspent funds may be reallocated to other program areas. Clearly, this will result in the loss of state funding due to the delay in availability of the federal funding.

Dedicated to reducing flood losses in the nation.

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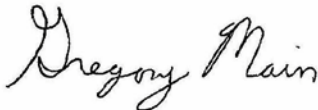
The delay of CAP-SSSE funds is also hampering some states' ability to use these funds as an effective supplement to the Risk MAP activity. Many corollary activities that State programs conduct, like preliminary map releases, open house schedules for new maps, and ordinance assistance, are heaviest in the first and second quarter of the federal fiscal year. This makes CAP-SSSE funding vitally important to supporting the coordination and adoption of NFIP maps.

ASFPM and its 29 Chapters represent over 14,000 state and local officials and other professionals who are engaged in all aspects of floodplain management and hazard mitigation, including 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.

ASFPM urges you to review this situation and take whatever action is possible to make certain that federal funds will be released to states for the CAP-SSSE Program as soon as possible in FY-11. This will ensure that State programs continue to provide technical assistance to NFIP communities, to evaluate community compliance performance in implementing NFIP floodplain activities, and to build community floodplain management expertise and capability. Floodplain management and the resulting reduction of losses due to flooding is a critical component of the NFIP. The functions performed using CAP-SSSE funds are essential to flood loss reduction.

If you have any questions or would like to discuss this issue further please contact me directly at (317) 234-1107 or the ASFPM office at (608) 274-0123.

Sincerely,



Greg Main, CFM
ASFPM Chair

cc: Edward Connor, Acting Federal Insurance and Mitigation Administrator, FEMA
Sandra K. Knight, Deputy Federal Insurance and Mitigation Administrator, FEMA
James Walke, Division Director Risk Reduction, FEMA
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