Mr. David L. Miller, Associate Administrator
Federal Insurance & Mitigation Administration
Federal Emergency Management Agency
1800 South Bell Street
Arlington, VA 20598-3020

Dear Mr. Miller:

It is our understanding that in response to Hurricane Sandy, the Federal Emergency Management Agency (FEMA) along with the states of New Jersey and New York will be establishing advisory flood hazard information that includes new flood elevation data that will assist affected communities as they begin the rebuilding phase. The Association of State Floodplain Managers (ASFPM) supports FEMA, New Jersey and New York in their efforts to establish these advisory data. ASFPM believes it is important to use the best available mapping data for rebuilding and reconstruction purposes and encourages community officials to utilize advisory data to the best of their abilities as they rebuild after Hurricane Sandy.

Prior to Hurricane Sandy, FEMA was already performing a restudy of the coastline in both New Jersey and New York to better characterize coastal flood risks. FEMA continues this study, which is being conducted as part of the flood mapping effort of the National Flood Insurance Program (NFIP). An important outcome of the study is the development of a number of products, including Flood Insurance Rate Maps, or FIRMs. These maps help in the determination of flood risk, and are used in establishing requirements for the purchase of flood insurance under the NFIP. This last point is very important, since the NFIP reform recently passed by Congress will move insurance premiums toward actuarial rates, so reconstructed building will experience premiums cost savings if properly constructed to new elevations.

ASFPM endorses development and use of the new advisory flood hazard information for these reasons:

1. Property owners and communities will have better data in rebuilding decisions to be safer and more resilient to next event.

2. Property owners can avoid experiencing higher premiums by building to old Base Flood Elevations (BFEs) if the data indicates that BFEs may increase. This is particularly

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important since under the NFIP reform, most buildings rebuilt in the 1% annual chance floodplain will move to actuarial premiums over the next few years.

3. Property owners building to advisory elevations will not become a non-conforming use.

4. Mitigation funding should require communities to use advisory data when rebuilding, so communities will want that new data as soon as possible to use in applications for mitigation grants in order to be an eligible application.

5. Critical facilities rebuilding to more accurate, updated advisory data is key to community resilience. As in Katrina, Public Assistance dollars should be tied to using the advisory flood hazard information, so it behooves community to have and use them.

Based on past experiences with significant events like Katrina, communities and citizens could find themselves facing several difficult rebuilding decisions that could have long lasting, negative ramifications which we think is possible to avoid by using the advisory data.

Providing advisory flood hazard information is an interim step in the mapping process not usually taken, but recognized by FEMA as vital for rebuilding a strong and resilient community. Building to these advisory data now will mean that damaged and destroyed buildings will likely be in compliance with the updated FIRMs planned for release in summer 2013. It is important to note that although the production of advisory flood hazard information for the New Jersey and New York coastline will be on an expedited schedule (FEMA anticipates as early as December 2012), FEMA indicates this will not affect their quality as they will be prepared using sound engineering and scientific practices.

Using advisory flood hazard information as the new standard for building and rebuilding can reduce the vulnerability of structures to flooding and, for a number of property owners, may help reduce flood insurance premiums. In addition to guiding reconstruction, the advisory flood hazard information can be utilized under four FEMA cost sharing mitigation grant programs: Public Assistance Grants, Hazard Mitigation Grant Program (HMGP), Flood Mitigation Assistance (FMA), and Pre-Disaster Mitigation (PDM) Program.

ASFPM appreciates FEMA’s efforts to quickly produce advisory flood hazard information and we strongly support this initiative.

Sincerely,

Chad Berginnis, CFM    Sally McConkey, P.E.  CFM
Executive Director    Chair

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