The Association of State Floodplain Managers is an organization of over 15,000 members who are primarily the state and local officials who are FEMA’s partners in implementing the National Flood Insurance Program and flood hazard mitigation programs. Our membership includes other professionals who support the work of state and local officials. Additionally, there are 35 state chapters, two of which include several states. All of our members are dedicated to reducing loss of life and property due to floods.

The costs to taxpayers of flood disasters continue to increase and our members are committed to reducing those costs. Toward that objective, we strongly support FEMA’s several programs which result in hazard mitigation because a serious focus on mitigation is the best way to significantly reduce costs and protect citizens and their property. A report of the Multi-Hazard Mitigation Council of the National Institute of Building Sciences found a return of $5 for every $1 invested in flood hazard mitigation.

To facilitate effective hazard loss reduction, we also strongly support a concerted effort to update and improve our nation’s flood risk maps. Risk identification is key to identifying where structures and communities are at risk and providing the necessary data in directing mitigation actions to achieve the greatest benefits. The Congress sent a clear message about the importance of improving flood maps by including, in the recently enacted Biggert-Waters flood insurance reform act, a first-time authorization for FEMA’s National Flood Mapping Program along with identification of new mapping tasks and an authorization level of $400 million per year for five years.

Our specific comments about elements of FEMA’s Fiscal Year 2014 budget request reflect this commitment to accurate flood risk identification and to flood hazard mitigation.

**Flood Hazard Mapping and Risk Analysis**

The budget request of $84.3 million is disappointing and worrisome if we are to make important progress in helping communities identify risk and take actions to reduce that risk. This amount is a significant drop from funding levels of about $220 million in FY ’10, $181 million in FY ’11, $97.7 million in FY ’12 and approximately $100 million in FY ’13. We are very grateful that the House and Senate Appropriations bills for FY ’13, although never enacted, did provide funding at levels well above
the FY ’13 budget request of $89 million. We appreciate that recognition of the importance of flood mapping and hope it will be possible to provide funds above the budget request again this year. Although some increase in the policy fee portion of funding for mapping is anticipated next year, the result would still be a significant reduction in overall program funding at a time when the recently passed NFIP Reform (Biggert-Waters 12) is moving many structures toward full risk rates, which again points out the need for accurate, up-to-date flood maps to appropriately rate the flood insurance premium. Furthermore, Congress has just tasked FEMA with important additional mapping activities via that legislation including undertaking improved processes in its new engineering studies needed to genuinely update map accuracy.

Last month, ASFPM issued a report “Flood Mapping For the Nation” in which a cost model was developed to identify the cost to complete the flood mapping for the country as well as the cost to maintain accurate flood data after it has been developed. The report concluded that with 10-12 years of full appropriations under the National Flood Mapping Program we can complete the job of mapping the nation and transition to simple maintenance of accuracy.

National Flood Insurance Fund – Combined Mitigation Programs
The $100 million for the combined mitigation programs of the National Flood Insurance Program (NFIP) is appropriate. This covers, with funds from the National Flood Insurance Fund (NFIF), funding for the Flood Mitigation Assistance program and the components folded under that umbrella – the Severe Repetitive Loss program and the Repetitive Flood Claims program. Unfortunately, funds under this combined program have not yet been made available because FEMA has not yet issued guidance for grant applications. We suggest that report language urging action on guidance issuance would be helpful.

Pre-Disaster Mitigation grants
ASFPM members are extremely disappointed that the budget request again this year requests no funds for the Pre-Disaster Mitigation program (PDM). Although the budget request indicates that $105 million will remain available in FY ’14 from unobligated prior year appropriated funds, those funds are largely already committed to projects. No new applications have been sought or accepted in FY ’12 or FY ’13. This is an essential source of mitigation funds for projects not initiated in a post-disaster situation. Importantly, the per state allocation of $575,000 has served, for many states, as the support funds for building state mitigation capacity and for state and local hazard mitigation planning. As an example, one state recently indicated to ASFPM that due to the unavailability of PDM the past two years, it is quite possible unless PDM is restored that the statewide hazard mitigation program will cease to exist. Clearly, PDM is not duplicative of other mitigation grant programs, especially in cases where: 1) Resources are needed for hazard mitigation planning and 2) in over half of the states where federal disasters are not regularly declared and PDM is the sole source of funds to assist with the maintenance of state hazard mitigation capability.

We gratefully note that the House and Senate Appropriations Committees acknowledged the importance of these per state allocations by providing limited funds in their versions of the (never enacted) FY ’13 Homeland Security appropriations bills. We very much hope it will be possible to again provide at least that limited funding for this important program in FY ’14.
National Preparedness Grants
The Administration has again proposed consolidation of several grant programs into National Preparedness Grants. The Appropriations Committees rejected the proposal last year. ASFPM members oppose proceeding with the combined grant. It seems very likely that mitigation for natural hazards will not fare well under this new formula. For example, although the proposal indicates that “mitigation-related capabilities” would be an eligible activity, ASFPM members have been informed by DHS that there will be no funding of natural hazard mitigation projects.

We hope these comments will be useful as you make decisions about the FY ’14 budget for FEMA. Please contact ASFPM Executive Director, Chad Berginnis, with any questions. He can be reached at (608) 828-3000 or at cberginnis@floods.org.