June 14, 2018

Honorable Richard Shelby, Chairman
Honorable Patrick Leahy, Ranking Minority Member
Senate Committee on Appropriations
Honorable Shelley Moore Capito, Chair
Honorable Jon Tester, Ranking Minority
Senate Appropriations Subcommittee on Homeland Security

Dear Chairs Shelby and Capito and Ranking Members Leahy and Tester,

The Association of State Floodplain Managers is very disappointed in the Federal Emergency Management Administration’s Fiscal Year 2019 budget requests for flood risk mapping and for Pre-Disaster Mitigation. The Administration requests only $100 million for mapping and $39 million for PDM. Investment in these two areas is essential to driving down the escalating costs of natural disasters. We recommend appropriations of $400 million for mapping and $500 million for PDM. We urge you to appropriate at least the FY18 levels of $262.5 million for mapping and $249.2 million for PDM.

We are very appreciative of the amounts approved by Congress for mapping and mitigation in the Omnibus appropriations bill for FY18. As you know, the FY18 Administration requests were also extremely disappointing for these programs and we are very grateful that this Subcommittee recognized their value and provided significantly higher amounts.

Mapping and Pre-Disaster Mitigation
There are major unmet needs for mapping and mitigation. Only about 1/3 of the nation’s stream miles and coasts have any flood maps, and only half of those maps have detailed information. Although the Technical Mapping Advisory Council has recommended more granular, structure-specific flood risk data, which is a worthy second-step objective, we would remind you that there are many areas of the nation using 20-year-old maps, and many areas which have never been mapped. A first-step is to get a flood map for every community in the nation. An ASFPM study of mapping needs and costs done several years ago found that another $4-7 billion is needed just to complete the step-one mapping. Accuracy of the basic maps is greatly enhanced by new technologies, particularly LiDAR elevation data. Identification of areas at risk of flooding not only

Dedicated to reducing flood risk and losses in the nation.
points to areas where the purchase of flood insurance is necessary, but also guides development and infrastructure decisions to make communities more resilient to future flooding.

The need for mitigation of existing structures to reduce or eliminate their risk far exceeds the available resources. Repetitive flood insurance claims are a major drain on the National Flood Insurance Fund. A recent report by the Institute of Building Sciences found that investment in mitigation saves $6 for every $1 spent. For flood losses, the return on investment is an even higher $7 saved for every $1.

While the need for pre-disaster mitigation is great and increasing, ASFPM is concerned about recent FEMA priorities for the PDM program. Last year, FEMA prioritized non-flood hazard mitigation projects and flood mitigation activities excluding acquisition, elevation or reconstruction as higher priorities for funding. ASFPM feels that this is shortsighted and largely eliminates the only permanent flood mitigation solution – acquisition - from even being considered for funding. An analysis by ASFPM of projects funded in FY17 (the most recent projects awarded), showed only 1% of PDM funds awarded in FY17 went towards acquisition. At the same time, the demand for these types of projects is great, and communities have expressed concern about the de-emphasis of these nonstructural options in the PDM program. ASFPM would appreciate any expressions of support by the committee for these very popular, much needed and cost effective nonstructural flood mitigation options.

**Flood Mitigation Assistance**

**Flood Mitigation Assistance is funded by NFIP flood insurance policyholders through the National Flood Insurance Fund.** FMA funds a variety of methods of flood mitigation and a significant component of its funding is directed to mitigation of Severe Repetitive Loss properties. These properties, which make numerous flood insurance claims, sometimes even cumulatively exceeding the value of the property, constitute a significant unnecessary drain on the NFIF.

We urge the Subcommittee to continue to provide **$175 million from the NFIF for FMA.** Much of this money will be wisely spent to very clearly reduce claims on the NFIF. Additionally, it is an important source of grant funds for those seeking to reduce their flood insurance premiums by mitigating their risk.

**Report Language on CAP and CTPs**

ASFPM members hope that the Subcommittee will include language, as it has in the past, noting the great value of the Community Assistance Program, which provides technical assistance to communities participating in the NFIP for managing their floodplains.

We also are hopeful that the Subcommittee will again note the benefits of the Cooperating Technical Partners element of the flood-risk mapping program. This mechanism promotes state and local engagement in the mapping effort – thereby improving map quality and local confidence in map accuracy.
DHS Science and Technology
ASFPM broadly supports investments in science and technology. More specifically, ASFPM supports the Research, Development and Innovation, and University Programs. Both of these programs provide critical resources to improve the nation’s capacity to prepare, respond, recover and mitigate against flooding by investing in critical research (unlike other federal water resource agencies like the Corps of Engineers or USGS, FEMA does not have its own, in house, research and development capability). For example, the University Programs supports the Coastal Resilience Center at the University of North Carolina, which has invested in better hurricane forecasting tools. The Flood APEX initiative of the RD&I program is making careful investments in technologies such as low-cost flood sensors that can be commercialized and cheaper than anything that exists on the market today.

ASFPM has 18,000 members nationwide and 36 chapters representing 41 states. Our members are state and local officials who are floodplain managers, planners, permitting, building code and land-use officials, as well as private sector engineers, hydrologists and mappers who assist states and localities. All are dedicated to reducing losses due to flooding.

Investment in risk identification and pre-disaster hazard mitigation will save lives, property and many taxpayer dollars in the future. The nation’s floodplain managers note and appreciate that you recognize this. We very much hope that you will be able to continue your efforts in the FY19 appropriations for FEMA.

Thank you for considering our views and recommendations. Please contact ASFPM Executive Director Chad Berginnis with any questions at cberginnis@floods.org or (608) 828-3000.

Respectfully,

Maria Cox Lamm
ASFPM Chair

Chad Berginnis
ASFPM Executive Director

cc: Members, Senate Appropriations Committee