



# Region 1 Status Report 2020

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**ASSOCIATION OF STATE  
FLOODPLAIN MANAGERS**

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## Introduction and Regional Overview

Region 1 includes Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont. All the New England states except Vermont are susceptible to coastal flooding. As such, Region 1 holds approximately 38% of the flood insurance policies in the nation. The region is home to more than 200 Certified Floodplain Managers (as of June 2020), and the number continues to increase as exams are offered annually in the Northeast.

ASFPM chapters in Region 1 include the Rhode Island Flood Mitigation Association and Connecticut Association of Flood Managers. Massachusetts has been working with a group of floodplain professionals to create the Massachusetts Association of Floodplain Management (massFM). It is still in the process of becoming an ASFPM chapter. These organizations hold annual conferences and sponsor training opportunities. Each is actively involved in promoting floodplain management and mitigation through education and public activities.

## Region 1 Priorities

**Community Assistance Program State Support Services Element Funding:** CAP-SSSE funding has remained level-funded in Region 1 for many years and has not kept pace with annual salary and cost of living increases, fringe benefits, and overhead costs. The CAP-SSSE funding needs to be adjusted annually to keep pace with the cost of doing business as state's risk cutting staff due to the inability to over-match the cooperative agreement. For the coming year there is a lot of changes and expectations that are being rolled out but are not being clearly articulated by FEMA as to what the States expectations are. Region 1 states routinely overmatch the program and are in dire need of additional staff. Management and Administrative costs are not allowed under this grant. With FEMA implementing the new tiered state framework, state self-assessment, five of the six New England states scored proficient, CT 41 (proficient), MA 39 (proficient), RI 44 (proficient), NH 39 (proficient), ME 44 (proficient), and one scored advanced, VT 50 (advanced).

- Recommendation: Adjust the annual CAP-SSSE appropriation to support the additional need and provide the states a percentage of this new money to more comprehensively implement the program. Region 1 recommends ASFPM leadership broach this issue with FEMA HQ because adequate CAP-SSSE funding is one of the regions' top priorities. Additionally, include grant administration funds in the Notice of Funding Opportunity.

**CIS:** The FEMA Community Information System only captures activities directly related to a particular community. There are many other assistance-related activities that are not being captured due to CIS limitations. There is no adequate place to report unless it's being reported outside of CIS, yet states are being encouraged to put "everything" in CIS.

- Recommendation: Continue to improve the CIS General Technical Assistance spreadsheet and add an option/component to CIS where states can capture additional non-community specific GTA. With the PIVOT system in place, it is recommended that FEMA finalize their Privacy Act legal review for PIVOT and determine what information states can access and provide justifications for what they cannot.

**Climate Change/Adaptation:** Region 1 states often are included in efforts regarding climate change, adaptation, and sea level rise. However, there is no activity task associated with these topics.

- Recommendation: Include an optional task in the CAP-SSSE NOFO and SOW for participation and activities related to climate change/adaptation and if applicable, sea level rise.

## **Cooperating Technical Partners**

**Funding:** Similar to the CAP-SSSE program, the CTP grant program has been routinely underfunded and remains relatively unstable. Without funds to support staffing levels, states are unable to meet the level of education, outreach and technical assistance necessary to support the mapping program. The small funding allocations, coupled with the need compete with higher risk states, makes this very difficult for Region 1



states to improve our many antiquated maps. Region 1 states have not applied for CTP funding in at least three years.

- Recommendation: Region 1 FEMA and states discuss the CTP program and its potential opportunities.

**Activities/Business Plans:** Very little guidance is given in regard to the CTP business plans and what activities are allowed under the CTP program.

- Recommendations: Increase regional input and coordination with CTP's annual business plans and provide one-on-one assistance/guidance for CTPs on how to broaden the CTP activities/participation in the program. Provide additional detail on what activities are acceptable under the program scope early on in the planning process.

**Communication:** Communications between the Region 1 staff and the states has gotten better but there is still room for improvement.

- Recommendations: Integrate more of the insurance and mitigation end of things and increase communication between states and FEMA Region I staff in an effort to better the program and all ongoing and proposed activities.

### **Community Rating System**

**Programmatic:** Many Region 1 communities continue to seek entrance into the program and some are working towards improving their class. There has also been interest from regional planning organizations on regional CRS applications. However, in many Region 1 communities, policy counts are low and local resources are slim. Therefore, when communities look at the heavy load of requirements to maintain a CRS program from year to year, it may be a difficult policy decision given all the other work that a municipality needs to accomplish. The CRS program is a program of exemplary floodplain management. However, this does not mean that it should be difficult for communities in good standing to participate. There is lack of FEMA staff to go out and perform the CAV's in a timely fashion.

- Recommendations: Simplify the CRS program and manual to make joining more tangible for smaller communities with fewer resources. Provide assistance on how states can determine their Uniform Minimum Credit to fulfill at least an entry level Class 9 for all communities in that state. ISO should hold annual "recertification" with states regarding uniform minimum credits and five-year "verification visits" with states to discuss uniform minimum credits and other CRS issues within the state. Additionally, an increase in communication between ISO and FEMA to conduct visits with interested communities and complete cycle visits in a timely fashion within the 5-year period may help promote growth within the program


### **Mapping**

**Notice of Funding Opportunity:** Activity 11 in the NOFO requires states "to work with the regions to develop flood mapping priorities". FEMA continues to make all mapping decisions and award mapping contracts without any collaboration with the state coordinator.

- Recommendations: More communications with the State Coordinators on what areas in their states need the most attention and mapping/ re-mapping.

**Funding:** Increased funding for mapping at the federal level is necessary in order to update aging flood studies. Inland communities continue to pay the price for focusing solely on updating coastal maps. Region 1 has also been conducting a number of discovery meetings region-wide without clear explanation of future prioritization or expectation for funding to complete studies while pre-identified areas continue to remain outdated.

- Recommendations: Provide base funding allocation and technical support to revise outdated maps. This will increase public awareness of flood risk and influence future development and floodplain management decisions. In addition, promote better communication from FEMA HQ and FEMA Region



I to Region 1 partners about FEMA Risk MAP projects underway in the state and current status/timeline for each.

**Unnumbered A Zones:** Zone A areas with no Base Flood Elevation are an issue as development increases. There is a lack of funding to address these areas to develop BFEs. This lack of BFEs in Zone A areas also affects insurance premiums for residents. Some unnumbered A Zones in the region have been modeled by FEMA, but it is unclear if or how the data will be updated in future map panels.

- Recommendation: FEMA should develop a mapping tool that allows community officials and states the ability to access elevation data developed for recent mapping projects that include model-backed Zone A/Base Level Engineering information, so communities can easily access the best available elevation data for unnumbered A zones.

### **Mitigation**

**Administration:** Region 1 states continue to aggressively pursue mitigation funding opportunities; however, FEMA's grant and program administration is inefficient. Following several federal-declared disaster and series of annual mitigation funding cycles, there is insufficient staff to review and approve sub-applications.

- Recommendations: Offer states additional support to prepare and submit complete sub-applications in accordance with federal guidelines. Promote workshops designed at sub-application development to streamline the process and ensure consistency of regional reviewers in order to expedite review and minimize Requests for Information.

**Hazard Mitigation Assistance Program:** HMA is requiring CLOMRs for floodplain restoration projects that lower the Base Flood Elevations, which is not required by the CFR. These projects should be permitted through the communities' regulations in keeping with NFIP requirements, and a LOMR is appropriate after the project is complete to update maps/FIS.

- Recommendations: For both HMA and PA, there needs to be changes in policy to avoid inefficiency and bad outcomes that get in the way of good mitigation projects. Review requirements of HMA and continue to streamline the programs.

**Coordination with State Hazard Mitigation Officers:** Provide more opportunities for coordination and collaboration with the NFIP coordinators and SHMOs.

- Recommendation: Hold a Region 1 Mitigation Workshop that is frequently mentioned on Region 1 calls, which would include representatives from floodplain and mitigation teams from all Region 1 states and the FEMA team.

**Repetitive Loss (RL) data:** Address problem of state and municipal officials accessing FEMA insurance and RL data and the Information Sharing Access Agreement.

- Recommendation: Outline a clear process to remove properties from the RL list due to mitigation. This is an increasing problem due to the insurance ramifications of being designated RL under BW12 and HFIAA.

### **Training**

General training opportunities: Additional training opportunities are always needed at the state and local level, as well as for design professionals, professional organizations, lenders and insurance agents.

- Recommendations: Promote cross training for local floodplain managers and emergency managers. Increase opportunities for floodplain management 101, elevation certificates, coastal construction, E273 Floodplain Management, CTP topics and CFM refresher courses. As well as coastal construction for building officials and engineers, implications of floodplain regulations on development for architects, EC review techniques, Increased Cost of Compliance usage and a webinar for NFIP coordinators on the current review and approval procedures and requirements for LOMCs through eLOMA (i.e. requirements for Zone A submittals) and online LOMC tool.



Update the FEMA publication Managing Floodplain Development in Approximate Zone A Areas.

**Certified Floodplain Surveyors program:** Further investigate the Certified Floodplain Surveyors program as it would be beneficial for surveyors interested in integrating sound floodplain management best practices into their field work.

**Substantial Damage/Substantial Improvement:** With FEMA's emphasis on substantial damage/improvement in CAP-SSSE guidance, training specific to that topic is needed.

- Recommendation: Development of a substantial damage/improvement workshop and materials, including a template that could be easily customized and deployable by a state.

**Risk Rating 2.0:** as the Risk Rating 2.0 insurance rating approach begins to unfold, it will be imperative that FEMA supply training materials so that we can reach out to our communities to deliver appropriate messages for this critically important understanding of the new flood risk awareness methods.

## Region 1 Accomplishments


Several communities across New England joined the CRS program for the first time or have increased their class rating.

### New Hampshire:

- In October 2019, the New Hampshire Silver Jackets Team released the Flood Hazards Handbook for Municipal Officials, a new guide intended to help communities in the state prepare for, respond to, and recover from floods more effectively. The handbook includes guidance, best practices, and information about available federal and state resources organized into situation-specific sections: Before the Flood, During the Flood, and After the Flood (Short Term Recovery and Long Term Recovery Considerations).
- Developed Best Practices for an Effective Local Floodplain Management Program fact sheet and sample template of administrative procedures for municipalities.

### Massachusetts

- Completed the State Hazard Mitigation & Climate Adaptation Plan, an interactive public website with plan elements, climate change data for the state, links to other climate and hazard sites, and related planning and mitigation actions.
- The MA "Chapter" (unofficial as of this date)—massFM is planning its first annual membership meeting for this fall, which is anticipated to be virtual due to the pandemic. The first election of officers will take place, along with a meeting and several training sessions. Since last year the organization has hosted several more training events, become an official state and federal non-profit, and has published newsletters. The next newsletter is expected to be published in July 2020.
- Developed several new training sessions this year, including Letters of Map Change for Realtors, and a session on the Technical Bulletin 10 with regard to Conditional Letters of Map Revision Based on Fill and the basements planned for those. We look forward to FEMA support for updated Substantial Damage training, as well as FEMA support for flood insurance promotion activities.
- Received a score of 39 (Proficient) on the 2020 Tier State Framework report, and is currently working on resolving some of the activities that will increase our scoring over time. This work includes updating data in the CIS, developing a robust state plan for substantial damage implementation post-disaster, and more closely monitoring training topics and attendance by communities.
- Currently (as of 4-1-20) has 22 CRS communities, 9 of which are supported by the work of a Barnstable County (Cape Cod) regional CRS coordinator.

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- MA has developed an updated State Model Floodplain Model Bylaw, which is anticipated to be promulgated later in 2020 to all 341 MA NFIP communities.

## **Connecticut**

- In May 2019, two new towns joined CRS as Class 8 communities, and one town upgraded its current class to Class 7.
- Connecticut joined the US Army Corps of Engineers Silver Jackets program and is working on their first project with them, Ice Jam trainings.
- Connecticut updated their Hazard Mitigation Plan in 2019
- Proctored the CFM Exam for four applicants
- Governor's Council on Climate Change (GC3) was initiated to bring state agencies together to address resilience and adaptation initiatives.

## **Rhode Island**

- Worked under the constraints of COVID-19 to still effectively adopt new Flood Insurance Rate Maps for the Wood-Pawcatuck Watershed.
- Community Rating System Users Group was restarted after a two-year hiatus and was able to meet twice and discussed in depth elevation certificates and the proper completion and review process. More meetings are expected post-COVID.
- The Rhode Island Floodplain Mapping Tool was updated with a new user interface.
- Updated their State Hazard Mitigation Plan and included climate change
- The state has been working aggressively toward goals regarding climate change. In January 2020, Governor Raimondo signed an Executive Order advancing a 100% renewable electricity future for Rhode Island by 2030.

## **Maine**

- Governor Janet Mills and the Governor's Office of Policy, Innovation, and the Future launched the Maine Climate Council initiative on September 26, 2019. As co-chair to the Community Resilience Planning, Public Health, and Emergency Management working group, the State Hazard Mitigation Officer led the discussions on top mitigation and adaptation strategies for the state to invest more resources, in the face of climate change. Proposed strategies, spanning state mitigation funding, increased technical assistance, and regulatory reviews across all Maine law represent only a few of the major elements being presented to Maine leadership in the summer months.