

Region 5 Annual Status Report



2020-21

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Introduction

As I wrote the annual report last year, the global pandemic was just starting. It was difficult to imagine then, that a year later, we would all still be working from home and that the virus would continue to disrupt our lives. But there is light at the end of the tunnel. As vaccination availability continues to increase, and we move ever closer to herd immunity, we all look forward to getting out of Emergency Operation Centers and returning to some level of normalcy.

An email was sent to all of the State NFIP Coordinators and State Hazard Mitigation Officers in FEMA Region V requesting input into this report. The email contained a series of questions intended to help spur thoughts and feedback for this report. The questions covered the following topics: 1) Policy suggestions for ASFPM, 2) Legislation, 3) Disasters, 4) Challenges, and 5) Highlights. The email responses received are summarized under the report headings below.

The FEMA Region V states include: Illinois (0), Indiana (0), Michigan (1), Minnesota (0), Ohio (0), and Wisconsin (1) and 34 Tribal Nations (0). The number in parenthesis after the state/Tribal Nation name is the number of Major Disaster Declarations for flooding in that state since January 2020. All states continue to loan staff to emergency response and recovery efforts as part of the Major Disaster Declaration for all Region V states in January 2020.

Key Accomplishments

The following bullets highlight some key accomplishments submitted by NFIP State Coordinators and State Hazard Mitigation Officers in Region V.

- Michigan NFIP State Coordinators Office added a full-time employee to their staff. Her name is Joy Brooks and she has 20 years of experience with floodplain management at the local level. The addition of Joy to the state will increase state productivity in all aspects of floodplain management and CAP fund job duties.
- Minnesota earned “advanced state status” as part of FEMA’s NFIP State Tier Framework system.
- Minnesota increased the number of issues of their newsletter “*Water Talk*” from four to six issues, while increasing subscriber numbers. The state also produced its first floodplain management education video titled – “[Is My House in the Floodplain](#)” – which shows how to use the FEMA Map Service Center site for areas with DFIRMs, paper maps and no maps. It was placed on YouTube in May 2020, made public in July 2020, and now has over 3,750 views.
- Minnesota is close to making the Lake Flood Elevations Online website public.
- ODNR’s Floodplain Management Program is coordinating with representatives from Ohio Emergency Management Agency’s (OEMA) Mitigation & Disaster Recovery Branches, Ohio Building Officials Association (OBOA), International Code Council (ICC), and Ohio Floodplain Managers through a “Substantial Damage Assessment Workgroup” to update Substantial

Damage Assessment guidance and recommended processes. This guidance will be used to develop and deploy Substantial Damage Assessment workshops and update procedures for coordination with Ohio EMA and OBOA.

- ODNR Floodplain Management Program began offering online NFIP training opportunities as a result of the pandemic. Courses have been offered on a range of topics and have been well attended.
- Illinois continues to work on Silver Jacket projects with the USACE and other partners to complete elevation surveys along the Mississippi and Illinois rivers, preparing damage estimates to help local floodplain managers determine what structures are at risk during flooding.
- Illinois also began a quarterly newsletter for the nearly 900 NFIP communities in the state containing articles related to permitting and mapping.
- Illinois has reached 73 CRS communities in the state.
- The State of Wisconsin worked with 74 communities to get registered in FEMA GO to apply for BRIC in 2020. The state ended up submitting 34 applications once sub-applicants realized the amount of work required to submit a grant application.
- Ohio EMA processed 70 pre-applications requesting \$133 Million for the BRIC and FMA programs in FY2020. The state ended up submitting 14 BRIC applications and 2 FMA applications totaling over \$64 Million.

Challenges

The bulleted items below list challenges referenced in multiple state responses to the request for information.

- Risk Rating 2.0 – Most states are hopeful that Risk Rating 2.0 will bring some long needed improvements to the NFIP, but concerned about the lack of details being provided by FEMA. States are important partners in helping to sell these types of large scale changes, but the lack of detail prevents a complete understanding of the proposed changes which ultimately may hurt this federal effort.
- Personally Identifiable Information (PII) Restrictions – While FEMA has made great efforts in improving the PIVOT system used to store and serve NFIP data, many states expressed a similar effort is needed to improve the system in place for sharing flood insurance data with those communities that have a legitimate need to know.
- BRIC/FEMA GO – Many states expressed thanks for the increase in mitigation funding available through the new BRIC program. States are anxious to see the types of projects that are funded in the first round of the program and would like FEMA to engage states on how the program could be improved moving forward. FEMA GO was a challenge for many states, especially the interactive pieces with SAM.gov and DUNS numbers. Additional engagement between FEMA and states is needed to ensure that FEMA GO serves the needs of all stakeholders.

- COVID-19 – State employees from most states have been working from home and limited to virtual meetings. This has challenged NFIP and HMA staff and all are looking forward to a return to the new normal.
- Many states expressed that more help is needed with small communities writing grants and meeting match requirements for the HMA programs. There are many changes that FEMA could make in the HMA Guidance document that would help the programs be more equitable.
- In Illinois, a state bill was recently introduced that would restrict all inspections of property without owner approval, except for health emergencies or police and fire concerns. This legislation would affect the ability of local floodplain administrators to conduct substantial damage inspections.
- Many states expressed concern that FEMA must do a better job in the BRIC NOFO for FY21 to discuss state deadlines and the amount of work required for a successful application. Specifically, FEMA needs to address the amount of data and complexity around the benefit cost analysis required for the grants.
- With the new focus on infrastructure in the BRIC program, several states recommended that FEMA review some of the public assistance program requirements for opportunities to streamline the program requirements, specifically for benefit cost requirements. One example is to allow the use of Appendix J to prove cost-effectiveness for HMA programs. Another is if substantially-damaged structures do not require a BCA in HMA programs, why do publicly-owned facilities that are deemed substantially-damaged require a full BCA to establish replacement costs? Standardizing these requirements would reduce program complexity and increase program effectiveness after a disaster.
- While NFIP state coordinators and SHMOs in FEMA Region V fully support implementation of building codes as the best form of mitigation, there are concerns with the methodology for emphasizing building codes in the review of BRIC grant applications. The FEMA BRIC application scoring criteria places a heavy emphasis (35 out of 100 possible points) on adopting the latest two versions of the building code. This emphasis is double counted since the BCEGS scoring process places such a heavy emphasis on adoption of the last two version of the ICC code. Instead of measuring adoption rates, FEMA should be measuring enforcement of building codes. Unless this requirement changes for next year's BRIC funds, many states will be penalized in the mitigation grant application review process. All states were challenged with holding public meetings due to the COVID pandemic, and these meetings are a required part of the code review process in many states. Some states with codes similar to ICC, and in many cases more restrictive, are being penalized by the scoring criteria for minor differences with ICC standards.

Priorities

- Many states mentioned that they plan to use increased CAP funds to hire additional staff in the coming year.
- Minnesota has transitioned to virtual training and will be focusing in the upcoming year on delivering a number of virtual courses. The transition to virtual courses has provided the

state the opportunity to update the course materials and has increased attendance for the training events offered so far.

- Illinois will be focused on completing a comprehensive update to the Illinois State Water Plan. This plan addresses all things related to water including water quality, climate change, water resources, flood damage mitigation, navigation, recreation, etc.
- In the coming year Illinois will also develop a webinar series for local floodplain managers addressing map reading skills, permitting, elevation certificates, substantial damage, and violations.

Recommendations

Below are recommendations that ASFPM should consider in carrying out its mission in the coming year.

- Provide information and training on Risk Rating 2.0. Continue to collect and push forward issues and concerns raised by the states in the region.
- Help FEMA with equity by reducing the complexity of flood mitigation programs. This will enable greater participation from disadvantaged communities and more effective implementation of programs.
- FEMA administers one of the most widely adopted building code programs in the world through the NFIP. They also collect data nationwide on the enforcement of these codes through the CAV/CAC process. FEMA should strongly consider using NFIP enforcement data as a scoring criteria for HMA grants as this would be a better measurement of a community's resilience and improve implementation of both programs.
- Continue to work with FEMA on ways to improve the Hazard Mitigation Assistance Programs.