

Community Rating System Newsletter



Coastal Barrier Resources Act (CBRA) Areas & CRS Credit

A little-known federal program with similar objectives as the Community Rating System could help floodplain managers accrue more CRS credits and improve floodplain management. The Coastal Barrier Resources Act (CBRA) shares complementary goals with the CRS. Enacted in 1982, CBRA has three goals:

- Discourage flood- and hazard-prone development along the nation’s coasts in order to save lives and reduce property damage.
- Conserve habitat for wildlife, including fish and shellfish, and the economies that depend on them.
- Save federal tax dollars by prohibiting most federal expenditures on areas included in the CBRA system.

By all measures, CBRA is doing its job. According to the Journal of Coastal Research, CBRA has saved the U.S. Treasury [\\$9.5 billion in avoided federal expenditures](#), and is on track to save billions more. CBRA has [reduced development density in about 85 percent of the areas included in the CBRA system](#), reducing people’s exposure to dangerous acts of nature. CBRA areas also [help reduce damage from floods in nearby, non-CBRA zones](#) because CBRA’s undeveloped coastal lands and wetlands buffer waves, absorb storm impacts, and help protect upland communities. At the same time, [CBRA areas provide much-needed habitat](#) for a wide variety of wildlife, including threatened and endangered species. Roughly 3.5 million acres of undeveloped barrier islands, beaches, spits, and nearby wetlands and estuarine areas are included in the CBRA system along the Atlantic, Gulf of Mexico, Great Lakes, Puerto Rico, and U.S. Virgin Islands.



CBRA doesn't prohibit development, it simply removes tax dollars from underwriting it. CBRA's unique approach has led to consistent bipartisan support. In 1982, [President Ronald Reagan praised CBRA](#), saying it "enhances both wise natural resource conservation and fiscal responsibility." In 2000, [President Bill Clinton hailed CBRA](#), noting that "by limiting federal subsidies, CBRA discourages development, keeping lives out of harm's way, protecting fish and wildlife habitat, and reducing wasteful expenditures of taxpayer dollars." And in 2018, [President Donald Trump signed a bill into law](#) that added more than 18,000 acres to the CBRA System.



CBRA complements CRS's objectives and could be leveraged by local governments to achieve credit in several CRS Activities, including four in particular:

- Activity 420: Preserving open space and protecting natural floodplain functions.
- Activity 430: Regulating development in the floodplain.
- Activity 510: Developing a floodplain management plan.
- Activity 520: Acquiring and relocating buildings.

Activity 420: Preserving open space and protecting natural floodplain functions.

Communities with CBRA units have an opportunity to leverage the benefits from those units within the CRS. For example, under Activity 420, communities could purchase CBRA lands from willing buyers and maintain them as open space. Typically, purchasing coastal property is very expensive, but owners of property in the CBRA may be more willing to sell because the property does not benefit from certain federal subsidies associated with development.

Many CBRA properties have been purchased for conservation purposes, including in states experiencing high coastal development pressure. For example, in [2019 North Carolina purchased 35 acres](#) of undeveloped oceanfront property that a developer had wanted to subdivide into 23 lots. The purchased land was added to a coastal reserve that provides important habitat for shorebirds. In January 2024, South Carolina and partner organizations [purchased 219 acres on Waties Island](#), which provides critical habitat for loggerhead turtles and shorebirds. Acreage from the purchased area was added to a heritage preserve to expand its benefits, while the bulk of the



purchase will become a new state park. And in [2021, Alabama purchased more than 800 acres](#) of coastal habitat to support and protect bird populations. All of these purchased properties were in the CBRA system.

Along with acquiring CBRA properties, local governments could pass regulations that mirror CBRA restrictions, such as prohibiting local government expenditures in areas included in CBRA as a counterpart to CBRA’s prohibition on federal expenditures. This would further reduce incentives to develop the property. Local governments could also enact low-density zoning requirements in CBRA areas. The CRS defines “low-density” development as a lot that is at least five acres in size. CBRA also requires that areas within it be at least five acres in size, which would automatically qualify a CBRA unit for low-density zoning under the CRS.

Activities 430, 450 and 510: Regulating and planning for development.

CBRA areas are often beaches, dunes, islands, and nearshore areas that are prone to erosion. **Activity 430** provides credits for developing coastal erosion management regulations and dune and beach regulations that prohibit construction within mapped areas. Restricting development in CBRA areas could qualify for credit under this activity.

Activity 510 provides credit for floodplain management plans, habitat species assessment, and natural floodplain functions plans that address the natural resources of floodplains and recommend ways to protect them. This can include floodplain areas that protect, conserve and restore habitat, provide open space corridors or connected networks of wetlands, or provide other ecological attributes. Many CBRA areas are wetlands that are important habitat to endangered species, while beaches and dunes in CBRA support a wide variety of birds, sea turtles, and other species. It would be useful to target CBRA areas for protection as part of the floodplain management plan.

CBRA and the CRS share similar goals. Communities with CBRA areas should examine ways that CBRA’s benefits could be leveraged within the CRS to enhance floodplain management and accrue additional CRS points.

–This article was written by Beth Millemann, a National Coastal Policy Consultant with the National Audubon Society.

Also in this Issue:

New Elevation Certificate Correction Guidance

FEMA CRS Regional Coordinators

Training Opportunities



New Elevation Certificate Correction Guidance

The 2023 Elevation Certificate (EC) included two new mandatory fields in Section C and made two new fields in Section G mandatory. Corrections to these parts of the form have caused uncertainty and confusion for communities since the form was published. FEMA has recently worked with the CRS program to revise the “Memo of Review for Correctness and Completion” (generally referred to as the “Correction Memo”), so these newly-required fields can be corrected appropriately. FEMA has also created guidance for how to correct errors with Section G.

The two fields for “Natural” and “Finished” grades in C2f (LAG) and C2g (HAG) can be filled out/corrected using the Correction Memo as can the two newly-required fields in Section G (G8 and G11).

Section G has additional situations that has caused some uncertainty. Sometimes surveyors digitally sign and lock the form, which doesn’t allow editing capability for local officials. Section G can also be missing from the form completely once it’s submitted to the community by a surveyor. The community may have forgotten to mark field G8 and/or G11. Lastly, sometimes it is very difficult to get a surveyor to correct the original form. Understanding all of these hurdles for communities, FEMA has allowed various methods of correcting these problems. A [new guidance document](#) on the various ways you can correct problems with Section G is available. In the Activity 310 section, look for “Section G Correction Options.”

Your CRS Resource Specialist will assist you if you face one of these problems.



FEMA Elevation Certificate & Floodproofing Certificate News

On July 7, 2023, the new FEMA Elevation Certificate (EC) and Dry-Floodproofing Certificate for Non-Residential Structures (Floodproofing) forms became available. On Aug. 9, 2023, FEMA released the Write Your Own (WYO) Company [Bulletin w-23007](#), which extends the use of the previous EC and Floodproofing forms until Nov. 1, 2023.

For CRS communities and CRS annual requirements, this means that any EC or Non-Residential Floodproofing Certificate signed and certified on or after Nov. 1, 2023, must be on the latest FEMA form. It is an error for CRS purposes if a previous form is submitted with a date on or past Nov. 1, 2023.

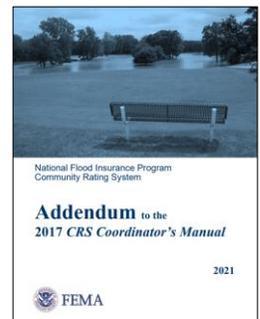
If you have any questions about the new forms, please contact the ISO Resource Specialist that handles your annual recertifications and construction certificate reviews, or your ISO/CRS Specialist who handles your cycle verifications.

The 2021 “Addendum to the 2017 CRS Coordinator’s Manual”

The [2021 “Addendum to the 2017 CRS Coordinator’s Manual”](#) is available and being used in conjunction with the current CRS “[Coordinator’s Manual](#).” It serves as a bridge between the 2017 guidance materials and the more comprehensive update that is anticipated when FEMA fully implements its National Flood Insurance Program (NFIP) transformation. Page A-4 of the “Addendum” explains, “How to Use the 2021 Addendum.”

The “Addendum” includes two new prerequisite requirements, several new CRS credit opportunities, and some updates and modifications aimed at simplifying credit and reporting requirements. A collection of [frequently asked questions about the Addendum](#) is also available.

Also available is “[A Supplement to CRS Credit](#),” which is a guide Community CRS Coordinators may refer when their program does not exactly match the scoring criteria in the “Coordinator’s Manual” and/or the “Addendum,” and partial credit is made available. Nothing in this document constitutes a change in the CRS or a change to any current scoring policies or procedures. Its goal is to help ensure that all possible CRS credit, including partial credit, is provided to communities



FEMA CRS Regional Coordinators

Each FEMA region designates a FEMA CRS Regional Coordinator to assist NFIP communities that participate in the CRS or are interested in joining the CRS. Below is the current list with contact information. For future reference, the [CRS website](#) maintains any updates to the list.

- Region I:** John Grace, (857) 205-2839, john.grace@fema.dhs.gov
- Region II:** Jonathan Smith, (202) 285-9235, jonathan.smith@fema.dhs.gov
- Region III:** Bobby Cobelli, (202) 674-9244, bobby.cobelli@fema.dhs.gov
- Region IV:** Roy McClure, (770) 220-8835, roy.mcClure@fema.dhs.gov
- Region V:** Eric W. Kuklewski, (312) 408-5230, eric.kuklewski@fema.dhs.gov
- Region VI:** Gilbert Giron, (940) 383-7253, gilbert.giron@fema.dhs.gov
- Region VII:** Todd Tucker, (816) 283-7515, todd.tucker@fema.dhs.gov
- Region VIII:** Marijo Brady, (303) 241-5278, marijo.brady@fema.dhs.gov
- Region IX:** Antoinette Stein, (202) 288-1697, antoinette.stein@fema.dhs.gov
- Region X:** Michelle Parke, (202) 717-0067, michelle.parke@fema.dhs.gov



Remember Your Recertification Schedule

A recertification is a yearly check-in to confirm that your community is performing the annual requirements pursuant to the current “Coordinator’s Manual” and “Addendum.” This normally includes annual outreach requirements, publicizing and tracking services, preparing progress reports for plans, and records showing proper maintenance of your drainage system. Recertifications take place every year except for the year of your cycle verification visit.

The table below lists when your annual recertification is due. Each quarter, communities are notified 45 days ahead of the deadline and given the recertification packet to sign and return. If you do not receive a recertification packet, you can assume you were not required to recertify that year. This happens when you recently went through your cycle verification, are currently going through your cycle verification, or have a cycle verification scheduled for later in the year. Please pay attention to the emails you receive about this.

Direct any questions to the ISO/CRS Resource Specialist who contacts you for your recertification or Construction Certificate review. We now have [four ISO/CRS Resource Specialists](#) responsible for processing annual recertifications and reviewing Construction Certificates. They will be happy to help you.

CRS Annual Recertification Schedule			
CC-213 Recertification and Required Documentation Due to ISO By:			
1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Feb. 1	May 1	Aug. 1	Oct. 15
Alaska Connecticut Florida: Miami-Dade County Florida: Monroe County Illinois Indiana Iowa Kansas Maine Michigan Minnesota Mississippi New Hampshire New York North Dakota Ohio Pennsylvania Rhode Island South Dakota Vermont Wisconsin	Colorado Delaware Florida: All Others Kentucky Massachusetts Missouri Nebraska Puerto Rico West Virginia	Arkansas California Idaho Louisiana Montana North Carolina South Carolina Utah Virginia Wyoming	Alabama Arizona Georgia Hawaii Maryland Nevada New Jersey New Mexico Oklahoma Oregon Tennessee Texas Washington
Annual Recertification Information Distributed to Community By:			
Dec. 15	March 15	June 15	Sept. 1



Online Resources



If you cannot find information about the CRS or a document you need, please notify your ISO/CRS Specialist or NFIPCRS@iso.com. Below are helpful guidance documents and general information that can be found on the CRS Resources website.

Webinar Schedule—This is posted on the [Training & Videos page](#) of the CRS Resources website. All classes begin at 1 p.m. Eastern/10 a.m. Pacific.

- Oct. 15 Introduction to the CRS
- Oct. 16 CRS and Higher Regulatory Standards
- Nov. 19 Preparing a Verification Visit
- Nov. 20 Developing a Flood Insurance Assessment

[Making Corrections to the Repetitive Loss List](#) is a one-page CRS handout that describes the new procedure by which communities submit to FEMA corrections to the repetitive loss list, using the Repetitive Loss Update Worksheet, also known as the AW-501.

[CRS Credit for Stormwater Management](#) is a full guide, including examples, to help communities tailor their stormwater management and watershed management programs in ways that reduce flood losses, protect natural processes, and earn CRS credit. This 2020 edition provides background on the creditable management techniques, discusses the legal aspects of such management, and describes various ways to document the creditable activities.

View past issues of the “[NFIP/CRS Update](#)” newsletter (now called the “Community Rating System Newsletter.” The new newsletter will be posted on FEMA.gov soon.

[Success with CRS](#) is a website with articles about the many ways communities have found their own types of success through the CRS.

Resources to Promote Flood Insurance

The [FloodSmart website](#) and its [agents page](#) have an array of materials targeted toward consumers and insurance specialists. [NFIP Claims Handbook \(FEMA F-687\)](#) guides policyholders in filing claims for flood damage. There are free materials available from [FEMA’s media library](#).

Keep Your Contact Information Current

If there are any staff changes (such as a new CRS Coordinator) or contact information updates in your community, please let your ISO/CRS Specialist know so we can update our files. If we cannot get in touch with the right person at cycle or recertification time, it creates unnecessary delays and difficulty with maintaining your classification.



About the Emergency Management Institute

FEMA's Emergency Management Agency (EMI) in Emmitsburg, Maryland, offers training on topics related to floodplain management, mitigation, and construction, including the basic Community Rating System course (E0278). These courses are oriented to local building, zoning, planning, and engineering officials.

Tuition is free for state and local government officials, travel stipends are available, and on-campus lodging is free. Free transportation is provided from the airport to the campus and back to the airport. The only out-of-pocket expense is a meal ticket, which includes an all-you-can-eat breakfast, lunch and dinner. Go to the [EMI Welcome Package page](#) for details. The Welcome Package also includes on-campus health and safety requirements.

The application to attend can be found [on this page](#) on the EMI website or call EMI at (800) 238-3358 or (301) 447-1035. Signed applications should be submitted through the state's Emergency Management Training Officer.

Workshops and Training related to the CRS

Community Rating System (E0278) (Field-deployed course is L0278)

This is the all-purpose training course for the Community Rating System. It is taught at FEMA's Emergency Management Institute (EMI) and at sites throughout the country at the request of interested communities, groups, or states, pending available funding. Attendees of E0278 CRS courses based on previous CRS Coordinator's Manuals may want to repeat this course. Therefore, restrictions on repeat attendance have been waived. No more than two persons per community may attend at one time. Two CRS courses are anticipated to be offered at EMI between Oct. 1, 2024 and Sept. 30, 2025, however the dates have not been determined. The FY25 course schedule for EMI will be available soon.

For continuing education credit (CECs) for certified floodplain managers (CFMs), the Association of State Floodplain Managers (ASFPM) will award CECs earned at the E0278 CRS course.

Prerequisite: To enroll in the Community Rating System course, you must be a Certified Floodplain Manager, have completed the National Flood Insurance Program course (E0273), or be a full-time floodplain manager with more than two years of floodplain management experience.

Earn CRS credit points: CRS communities can receive CRS credit points after their staff members complete certain training sessions.

Under Section 432.o, regulations administration (element RA) of the "Coordinator's Manual," five points are provided for each member of a community's floodplain permit staff who graduates from the following courses: E0194, E0273, E0278, E0282, E0284, or E0386 (up to 25 points).

Graduating from E0279 is worth up to five points under Activity 360 (Flood Protection Assistance).



National Flood Insurance Program– Aug./Sept. 2024

Managing Floodplain Development through the NFIP (E0273)

- Dec. 9-12, 2024; Feb. 3-6, 2025

E0273 is also field deployed periodically. Contact your State NFIP Coordinator for more information.

Hazard Mitigation Assistance—Developing Quality Application Elements (E0212)

- June 23-26, 2025

Hazard Mitigation Assistance—Application Review and Evaluation (E0213)

- July 21-23, 2025

NFIP/Community Rating System (E0278)

- Jan. 13-16, 2025; July 28-31, 2025

There are no classes scheduled at this time for the following:

- Hazard Mitigation Assistance Project Implementation & Program Closeout (E0214)
- Fundamentals of Building Science (E0312)
- Advanced Floodplain Management Concepts I (E0194)
- Retrofitting Flood-prone Residential Building (E0279)
- Residential Coastal Construction (E0386)
- Advanced Floodplain Management Concepts III (E0284)

Statement of Purpose

The “Community Rating System Newsletter” is a publication of the National Flood Insurance Program’s Community Rating System. It provides local officials and others interested in the CRS with news they can use.

The “Community Rating System Newsletter” is produced in alternate months by the Insurance Services Office, Inc. (ISO), which is the Lead Service Provider to the Federal Emergency Management Agency for the CRS.

The newsletter is distributed electronically, at no cost, to local and state officials, consultants, and other interested persons.

Communities are encouraged to copy and/or circulate the “Community Rating System Newsletter” and to reprint its articles in their own local, state or regional newsletters. No special permission is needed.

To become a subscriber or to suggest a topic that you would like addressed, contact NFIPCRS@iso.com.

