



NFIP/CRS UPDATE

August 2012

NFIP, CRS, and Natural Floodplain Functions

One of the most appreciated natural functions of both inland and coastal floodprone areas is their generation and maintenance of aquatic and terrestrial environments that nurture myriad species of plants and animals. Among those species are many that may face extinction, often because of loss of habitat. The Endangered Species Act of 1973 aims to protect such species by prohibiting anyone from “harming” or “taking” endangered species, and it extends similar protections to threatened species. Further, it requires all federal agencies to ensure that their actions do not jeopardize the continued existence of those species.

FEMA does not directly implement the Endangered Species Act—that responsibility rests with the U.S. Fish & Wildlife Service and the National Marine Fisheries Service (the Services). However, as a federal agency, FEMA is required under Section 7 of the Act to “insure that any action it authorizes, funds, or carries out is not likely to jeopardize” threatened or endangered species or their habitat. This means that actions conducted by communities, individuals, or others pursuant to a FEMA program may not jeopardize those species or their habitat. Thus, National Flood Insurance Program communities need to avoid modifications to the floodplain—such as fill—that could harm riparian or coastal habitats.

FEMA has established procedures by which applicants for Conditional Letters of Map Revision and Conditional Letters of Map Revision based on Fill (CLOMR and CLOMR-F) document that the Endangered Species Act has been complied with before FEMA will undertake its review of the CLOMR application. In general, that documentation takes the form of an official letter or determination from one of the Services stating either that the proposed action is not expected to affect the species or habitat or that a permit to cause such an impact has been granted. FEMA’s Procedural Memorandum No. 64, “Compliance with the Endangered Species Act for Letters of Map Change,” dated August 2010, lists the Endangered Species Act compliance needed for actions based on floodplain fill in NFIP communities, provides answers to frequently asked questions, and gives links to sources of more information about the Endangered Species Act. See <http://www.fema.gov/library/viewRecord.do?id=4312>.

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Natural Functions (cont.)

An analogous situation exists with regard to CRS communities, FEMA, and other federal environmental laws. For local activities that may have an adverse impact on certain species or their habitat, or on water quality, or historical or archaeological features, or wetlands AND for which a community is requesting CRS credit, a community must ensure that it has complied with the applicable federal protective laws. The procedures for documenting this compliance will be clarified when the 2013 *CRS Coordinator's Manual* takes effect. Materials accompanying the *Coordinator's Manual* will list the federal environmental laws pertinent to the various CRS activities and provide other helpful information.

Watch the next issues of this newsletter for more details about the connections between the CRS and protection of habitat and other natural floodplain functions.

What is a CRS Coordinator, anyway?

Many times over the years, CRS program staff have been asked to supply a job description for a local CRS Coordinator.

The CRS does not have specific requirements for the position of community CRS Coordinator. Every community is different, and should develop a job description that reflects the particular qualifications, skills, knowledge, and duties that will best serve its floodplain management program. CRS communities have had successful Coordinators who have come from a range of backgrounds and who have been local employees, contractors, citizen volunteers, and others. Only a community can determine its own best fit.

However, the CRS has now compiled a one-page guideline that summarizes some suggested qualifications, duties, and other information. Communities are invited to draw from these recommendations as needed.

Access the document, "The Community CRS Coordinator," at www.CRSresources.org/200.

Data on Minus-rated Policies Available

Want to see if your community has minus-rated properties? The minus-rated policy list gives information on buildings that are not eligible for the CRS discount because they are "minus rated," that is, their lowest floor is one foot or more below the base flood elevation.

If you are interested, e-mail NFIPCRS@iso.com for the list of minus-rated properties and please provide the community number with your request. Remember that all such insurance policy information is subject to the Privacy Act. Follow the same rules you use when handling repetitive loss information.

A New Way to Calculate a Community Growth Adjustment

Since the beginning of the CRS, credit points awarded for activities under the 400 Series, Mapping and Regulations, have been adjusted to recognize the impact of loss prevention activities in growing communities. The rationale for this is that growing communities face greater pressure for future development in their floodplains, compared to communities with little or no development pressure. Because enhanced floodplain management results in more flood loss prevention in developing areas than in areas that are not growing, the credits are increased accordingly. The CRS applies a community growth adjustment (CGA) by multiplying the number of points for the activity by the local rate of growth.

In most cases, the CGA value calculated to adjust community scores is based on population data and estimates of population growth provided by the U.S. Census Bureau. Although Census data are used most often, other sources provided by communities have been accepted and, in some cases, communities have opted to determine community-specific growth rates if it is determined to be to their benefit, rather than use Census Bureau rates.

Under the 2013 *Coordinator's Manual*, the CRS will take a new approach to calculating CGA values. A community's growth will be determined by calculating the county's growth in housing units, using estimates and projections over a 10-year period extending from five years before to five years after the verification visit. A community will no longer have the option of applying a growth rate that differs from its county's growth rate.

Advantages to the New Approach

This new approach brings several benefits.

- Since census data are not available until a year after the data are collected, CGA values determined under the current method are always at least one year out of date when the credit is adjusted. The new approach will more accurately reflect the current conditions of ongoing development. Further, the community's credit for managing new development will be based on current and expected growth rather than on what happened 10 years ago.
- Using housing units, rather than population, as a measure of growth is thought to be a better indicator of development pressure in the floodplain. In times of economic strength, construction activity rises in anticipation of growth, even when the population is not increasing. During economic downturns, less construction activity may result, even though there is population growth.
- Because estimates and projections can be obtained each year, CGA values for each community will be updated annually, rather than on the current five-year schedule. The new CGA values, however, will only be applied once the new *Coordinator's Manual* becomes effective and only when the community is verified at its cycle visit.
- Use of county growth rates, rather than community growth rates, is likely to reduce the variability in CGA values over time, because the rates are based on larger populations.

For more information on calculating growth rates, email nfipcrs@iso.com.

CRS Users Groups

Debbie Cahoon, CFM
Users Groups Liaison

Hi! As the summer temperatures increase, so too do the number of CRS users groups forming around the country. Since my last column, two new groups have begun the process of creation—one in Georgia and one in Washington state—for a total of 17 groups. Users groups have proven to be an important “support group” for communities as they face the challenges and prepare for the changes to be incorporated in the next *CRS Coordinator’s Manual*, due sometime in 2013. Earlier this year, FEMA and ISO offered plenty of opportunities to take advantage of the webinars that broke down the changes and showed how the new manual would differ from the current one.

- 26 webinars were held between February 9th and May 3rd;
- 7 webinars were hosted by FEMA/ISO; and
- 19 webinars were hosted by 12 of the users groups.

After the webinars, I emailed all the users groups to get their feedback on the webinars, find out how things were going for them in general, and hear whether they thought their communities were going to encounter any unusual problems in adjusting to the upcoming changes.

All in all, the webinars were a success, but they also uncovered some anxieties the communities had about how the changes were going to affect their CRS ratings. The feedback I received included worries about losing a class; wondering how other users groups were dealing with the proposed changes; speculation over the time frame for the new manual to be released; and concern about what all the changes will mean for recertifications and cycle visits.

Some of the feedback went deeper and revealed more specific concerns, such as the *Coordinator’s Manual* seems to be favoring communities with sophisticated GISs; worries on how the Uniform Minimum Credit will change; and the additional work it will take to develop a successful Program for Public Information (PPI).

From what I’ve seen and heard, the PPI is the next “big thing” for CRS and for the users groups. It makes sense when you think about it—more public information means a better informed citizenry, safer communities, and better floodplain management. The trick is to find what outlet works best for your community and tailor your messages to fit your situation and your citizens. The challenge lies in planning how to get those messages out when your community is on a fixed budget. A few of the users groups have decided to approach the PPI in a regional sense, using the user group itself as the core of the PPI committee. Those groups are in the fledgling stage as far as deciding on how the PPI committee will work, but I hope to report on their progress in my next column. There will be much more news in the coming months, so please stay tuned.

Until next time!



Keep an Eye on the CRS Website

As noted in the last issue, the final draft of the *CRS Coordinator's Manual* has been posted on the temporary “*Manual update*” website (www.CRS2012.org) so that communities can refer to it as they anticipate future activities. This final draft is being used in the Office of Management and Budget approval process. It is expected to become effective in 2013 (and therefore is being referred to as the “2013 *Coordinator's Manual*,”) but the exact date has not yet been determined.

Over the coming year, www.CRS2012.org will be replaced by a more comprehensive website with the publications and materials of the CRS, information about credited activities, and other information useful to CRS communities. Until then, resources referenced in the *Manual* will be posted on www.CRS2012.org as they become available.

FEMA Regional Office CRS Coordinators

Although a community's first point of contact on the CRS is usually the ISO/CRS Specialist for the area, an additional source of assistance is the FEMA Regional CRS Coordinator. There is one coordinator in each FEMA Regional Office. A Regional Office directory can be found at <http://www.fema.gov/contact-us>.

Last month, Cynthia McKenzie of Region 9 retired and Gregor Blackburn became the Region's new CRS Coordinator. Here is a current list of the Regional Office CRS Coordinators.

Region 1 – Chris Markesich—(617) 832-4712, Christopher.Markesich@dhs.gov
Region 2 – Rich Einhorn—(212) 680-8503, Richard.Einhorn@dhs.gov
Region 3 – Mari Radford—(215) 931-2880, Mari.Radford@dhs.gov
Region 4 – Janice Mitchell—(770) 220-5441, Janice.Mitchell@dhs.gov
Region 5 – John Devine—(312) 408-5567, John.Devine@dhs.gov
Region 6 - Linda Delamare, CFM—(940) 898-5279, Linda.Delamare@dhs.gov
Region 7 – Georgia Wright—(816) 283-7539, Georgia.Wright@dhs.gov
Region 8 – Barbara Fitzpatrick—(303) 235-4715, Barb.Fitzpatrick@dhs.gov
Region 9 – Gregor Blackburn, CFM—(510) 627-7186, Gregor.Blackburn@dhs.gov
Region 10 – John Graves, CFM —(425) 487-4737, John.Graves@dhs.gov

Statement of Purpose

The *NFIP/CRS Update* 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 *NFIP/CRS Update* is produced in alternate months. It is distributed electronically, at no cost, to local and state officials, consultants, and others who want to be on the mailing list. Communities are encouraged to copy and/or circulate the *Update* 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

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Training Opportunities

Bring the CRS to a Theater near You

The CRS is anticipating the conduct of several field-deployed CRS courses during calendar year 2013. Any state, CRS users group, or organization that would like to host a course in its area should get in touch with the FEMA Regional CRS Coordinator (see page 4).

More Help for CRS Communities

Don't forget that the CRS offers workshops and webinars to help communities with their elevation certificate and other requirements. If you are interested in hosting a webinar on the FEMA Elevation Certificate or any other activity, contact your ISO/CRS Specialist.

Workshops and Training on the CRS

— The Community Rating System (E278)

This is the all-purpose training course for the CRS. It is taught at both the Emergency Management Institute (see below) and at sites throughout the country at the request of interested communities or states. Note that this course now uses the 2013 *CRS Coordinator's Manual* (in draft form), which will become effective in 2013.

Prerequisite: To enroll in the CRS course, you must be a Certified Floodplain Manager (CFM), or have completed the National Flood Insurance Program course listed below (E273), or be a full-time floodplain manager with more than three years of experience specifically related to floodplain management.

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|--|------------------------------|
| Kansas City, Kansas (FEMA Region VII) | September 24–28, 2012 |
| Contact Melissa Mitchell at (913) 573-8664 or melmitchell@wycokck.org | |
| Jefferson Parish, Louisiana (FEMA Region VI) | October 15–18, 2012 |
| Contact Charlene Jones at (605) 736-6950 or cjones@jeffparish.net | |
| Lincoln, Nebraska (FEMA Region VII) | October 29—November 1, 2012 |
| Contact Bill Jones at (402) 471-3932 or bill.jones@nebraska.gov | |
| Emergency Management Institute (Emmitsburg, Maryland) | April 1–4, 2013 |
| | May 13–16, 2013 |
| | July 29—August 2, 2013 |
| Contact your state emergency management training office, EMI at (800) 238-3358 or (301) 447-1035, or see http://www.training.fema.gov/EMICourses/EMICourse.asp . | |

NOTE THAT THE CRS COURSE (E278) SCHEDULED TO BE FIELD-DEPLOYED IN DEL CITY, OKLAHOMA, THIS SUMMER HAS BEEN CANCELLED, AS HAVE THE EMI-BASED AUGUST AND SEPTEMBER CLASSES.

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Training Opportunities (cont.)

Other Courses at the Emergency Management Institute

Besides the basic CRS course, FEMA’s Emergency Management Institute (EMI) offers training on many related topics, including floodplain management, mitigation, and construction. These are oriented to local building, zoning, planning, and engineering officials. Tuition is free for state and local government officials and travel stipends are available. Call the training office of your state emergency management agency, see <http://www.training.fema.gov/EMICourses/EMICourse.asp>, or call EMI at 1-800-238-3358 or (301) 447-1035.

- **HAZUS-MH for Flood (E172)** December 3–6, 2012
..... May 13–16, 2013
- **HAZUS-MH for Floodplain Managers (E176)** March 18–21, 2013
- **Advanced Floodplain Management Concepts (E194)** August 26–29, 2013
- **Managing Floodplain Development through the NFIP (E273)** November 5–8, 2012
..... March 11–14, 2013
..... April 29–May 2, 2013
..... June 24–27, 2013
..... September 9–12, 2013

E273 is also field deployed periodically. Contact your State NFIP Coordinator for more information. Find your State Coordinator at <http://www.floods.org/index.asp?menuID=274>.

- **Retrofitting Floodprone Residential Buildings (E279)** May 6–9, 2013
- **Advanced Floodplain Management Concepts II (E282)** March 25–28, 2013
- **Advanced Floodplain Management Concepts III (E284)** July 8–11, 2013
- **Residential Coastal Construction (E386)** August 5–8, 2013

CRS communities can receive CRS credit points after their staff members complete certain training sessions. Under Section 431.n, Staffing (STF) of the *CRS Coordinator’s Manual*, five points are provided for each member of a community’s floodplain permit staff who graduates from courses E194, E273, E278, E282, E284, or E386 (up to 25 points). Graduating from E279 is worth five points under Activity 360–Flood Protection Assistance.

