

# A Supplement to CRS Credit

**October 2023**



*National Flood Insurance Program  
Community Rating System*

# Contents

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In this Supplement.....	1
200 Procedures	
211.a Class 9 Prerequisite .....	2
211.b Class 8 Prerequisite .....	2
211.d Class 4 Prerequisite .....	3
Activity 320 (Map Information Service)	
321.a Activity Description .....	4
322.a Basic FIRM information (MI1) .....	4
322.b Additional FIRM information (MI2) .....	4
322.c Other flood problems not shown on the FIRM (MI3) .....	4
322.e Special flood-related hazards (MI5) .....	5
Activity 330 (Outreach Projects)	
331.a Activity description .....	7
332.a Outreach projects (OP) .....	7
Activity 340 (Hazard Disclosure)	
342.a Disclosure of the flood hazard (DFH) .....	8
342.b Other disclosure requirements (ODR) .....	8
Activity 350 (Flood Protection Information)	
352.a Flood protection library (LIB) .....	9
352.c Flood protection website (WEB) .....	9
Activity 360 (Flood Protection Assistance)	
362.a Property protection advice (PPA).....	11
Activity 410 (Flood Hazard Mapping)	
410.b Activity Credit Criteria.....	12
412.a New study (NS) .....	12
412.c State review (SR) .....	14
Activity 420 (Open Space Preservation)	
422.a Open space preservation (OSP).....	15
422.c Natural functions open space (NFOS) .....	15
422.f Open space incentives (OSI) .....	16
422.g Low-density zoning (LZ).....	17
422.h. Natural shoreline protection (NSP) .....	17

Activity 430 (Higher Regulatory Standards)	
432.a Development limitations (DL) .....	18
432.b Freeboard (FRB) .....	21
432.c Foundation protection (FDN) .....	24
432.d Cumulative substantial improvements (CSI) .....	25
432e. Lower substantial improvements threshold (LSI) .....	25
432.f Protection of critical facilities (PCF) .....	26
432 g. Enclosure limits (ENL).....	27
432.o Other higher standards (OHS).....	28
432.q Regulations administration (RA) .....	28
Activity 440 (Flood Data Maintenance)	
442.a Additional map data (AMD) .....	29
442.b FIRM maintenance (FM) .....	29
Activity 450 (Stormwater Management)	
451.a Activity Description .....	30
452.a Stormwater management regulations (SMR) .....	30
452.d. Water quality regulations (WQ).....	31
Activity 510 (Floodplain Management Planning)	
512.a Floodplain management planning (FMP) .....	32
512.b Repetitive loss area analysis (RLAA) .....	34
Activity 520 (Acquisition and Relocation)	
521.b Activity Credit Criteria.....	35
Activity 530 Flood Protection	
531.b Credit Criteria .....	36
533 Credit Calculation .....	37
Activity 540 Drainage System Maintenance	
541.b Activity Credit Criteria.....	38
Activity 610 (Flood Warning and Response)	
611.b Activity Credit Criteria.....	40

## In This Supplement

This guide to CRS credit is provided as a supplement to the *CRS Coordinator's Manual* and the *Addendum to the 2017 Coordinator's Manual* (issued in 2021). Its goal is to help ensure that all possible CRS credit, including partial credit, is provided to communities.

Nothing in this document constitutes a change in the CRS or a change to any current scoring policies or procedures. Community CRS Coordinators may refer to this document for instances in which their program does not completely match the scoring criteria in the *Coordinator's Manual* and/or the *Addendum*. In those cases, a community's ISO/CRS Specialist likewise will rely on the further guidance provided in this supplement.

This supplement is not a stand-alone document. It is intended to be used in conjunction with the National Flood Insurance Program, the *Coordinator's Manual* and its 2021 *Addendum*, and with the CRS application procedures.

This supplement follows the organization of the *Coordinator's Manual*. However, it only contains the headings and subheadings from the *Coordinator's Manual* that are needed to introduce the pertinent explanations. **IF A CRS ACTIVITY OR ELEMENT DOES NOT APPEAR IN THIS DOCUMENT, IT MEANS THAT THERE IS NO ADDITIONAL CLARIFICATION AT THIS TIME.** Unless otherwise noted, page numbers refer to the 2017 *Coordinator's Manual*.

## 200 PROCEDURES

### 211.a Class 9 Prerequisites

- The following additional explanation pertains to prerequisite (5) on page 210-2 of the *Coordinator's Manual* and on page A-12 of the *Addendum*:

Communities document that they have met the prerequisite when joining the CRS (by signing form CC-230) and again at annual recertification (with form CC-213). The CEO's signature confirms the following:

"I hereby certify that, to the best of my knowledge and belief, we are maintaining in force flood insurance policies for insurable buildings owned by us and located in the Special Flood Hazard Area (SFHA) shown on our Flood Insurance Rate Map. I further understand that disaster assistance for any community-owned building located in the SFHA is reduced by the amount of National Flood Insurance Program (NFIP) flood insurance coverage (structure and contents) that a community should be carrying on the building, regardless of whether the community is carrying a policy."

Note that the flood insurance policies held on the insurable buildings owned by the community do not have to be NFIP policies.

- This additional explanation is provided about prerequisite (6), coastal communities, on page 210-3:

County-wide FIRMs can show a LiMWA in one community but not in others. If a draft FIRM has been presented to a CRS community with a LiMWA on it, the community must request that the LiMWA be shown on the final version, even if other communities do not want it shown in their corporate limits.

If a final FIRM was published before the first verification visit after the 2013 *Coordinator's Manual* and it does not show a LiMWA, the LiMWA prerequisite only affects later revisions of the FIRM if FEMA provides one on a draft map. A community is not expected to request a change to a map already published.

### 211.b Class 8 Prerequisites

- This additional explanation is provided about the freeboard prerequisite on page A-11 of the *Addendum to the 2017 CRS Coordinator's Manual*:

The one-foot-freeboard requirement applies to all AE Zones, all VE Zones, and all numbered AO and AH Zones. The requirement must be in effect at the time of the cycle visit or the community will not satisfy the requirement.

An attached garage is not required to be constructed to the required freeboard elevation or wet floodproofed to that elevation.

A community that has adopted and enforces ASCE-24 meets this prerequisite.

Home heating oil or propane storage tanks are not required to be elevated, but must meet the minimum conditions of the NFIP.

### **211.d Class 4 Prerequisites**

- This additional explanation is provided about prerequisite (3)(a)(1), freeboard, discussed on page 210-5:

In other words, a community must enforce one foot of freeboard for all new, substantially damaged, or substantially improved buildings throughout the SFHA to become a Class 4 or better. If the verification threshold for element FRB is not met, including the mechanical/electrical equipment, then the community does not meet the prerequisite.

- This additional explanation is provided about prerequisite (3)(b), stormwater management, discussed on page 210-5:

The credit that can be applied to meeting the Class 4 and Class 1 criteria for natural functions is only the credit for controlling the volume of runoff from new development. The maximum credit is 75 points if the volume of the 100-year event is controlled, 25 points for the 25-year event, and 7 points for the 10-year event.

## 320 (Map Information Service)

### 321.a. Activity Description

- This additional explanation is provided for the discussion on page 320-3 and 320-4:

A community or other agency may place restrictions on the provision of map information and still be eligible for CRS credit. For example, a community may refuse to provide information over the telephone in order to avoid errors in the property location. It may require a written request for map information. This would not preclude CRS credit.

A website service can be credited provided it meets all of the credit criteria. In particular, the inquirer must be able to obtain the information by entering a street address and there must be an opportunity for personal contact (see credit criterion 4).

For publicizing the service (Section 321.a(6)) through newsletters produced by target-audience organizations, the article about the service must have been published before the date of the community's cycle visit and documented by a copy of the pertinent newsletter page(s). A letter to the organizations or a draft article submitted to them is not sufficient for CRS credit.

If the community requests credit for publicizing the service to common user groups (Section 321.a(6)(b)), it may receive half credit if it is missing the documented publicity or the mailing list for one of the three groups. If publicity and/or mailing lists are missing for two groups, there is no credit.

### 322.a. Basic FIRM information (MI1)

- This additional explanation is provided for the discussion on page 320-8:

Credit for MI1 (and MI2) are for reading and providing information on the CURRENT EFFECTIVE FIRM. If a preliminary FIRM has been adopted as the community's regulatory map, then items such as the LiMWA on the preliminary FIRM are credited under MI3.

### 322.b. Additional FIRM information (MI2)

- This additional explanation is provided for the discussion on page 320-8:

Credit for MI2 (and MI1) are for reading and providing information on the CURRENT EFFECTIVE FIRM. If a preliminary FIRM has been adopted as the community's regulatory map, then items such as the LiMWA on the preliminary FIRM are credited under MI3.

- Under **Credit Criteria for MI**, this additional explanation is provided for credit criterion (2), discussed on page 320-10:

The Coastal Barrier Resources Act, and its later amendments, provide protection to undeveloped areas in the Coastal Barrier Resources System (CBRS). The Act prohibits most expenditures of federal funds, including the provision of flood insurance for new and substantially improved buildings, in any area designated by Congress as part of the CBRS. Only Congress can authorize a revision to the boundaries of the CBRS. The restrictions are covered in more detail in Unit 9, Section D, of FEMA-480, the *Floodplain Management Desk Reference*.

For MI2 credit, the community must advise inquirers if the property in question lies within the CBRS and, if so, that flood insurance, federal disaster assistance, and other types of federal financial assistance are not available for buildings constructed or substantially improved after the effective date of designation.

The “date of designation” for any given component of the CBRS is the date on which Congress added that component to the CBRS. If the boundaries of the CBRS are shown on a community’s FIRM, the date of designation is listed in the FIRM’s legend. However, FEMA has discontinued delineating CBRS boundaries on its FIRMs, so in the future a community will need to confirm the date of designation by other means to receive CRS credit.

### **322.c. Other flood problems not shown on the FIRM (MI3)**

- Under **Credit Criteria for MI3**, these additional bulleted examples are provided for credit criterion (2), discussed on page 320-11:

- SLOSH maps (the Sea, Lake and Overland Surges from Hurricanes (SLOSH) model is a computerized model developed by the National Weather Service to estimate storm surge heights).
- If a preliminary FIRM is adopted as the community’s regulatory map, then items such as the LiMWA on the preliminary FIRM are credited under MI3.
- A community can receive credit for both MI3 and MI6 with the same repetitive loss area map. This can only be done if parts of the repetitive loss area are outside the SFHA (MI3) and the community informs the inquirer of the two different pieces of information: first, that it is a problem area outside the SFHA (MI3); and second, that it is an historic flooding area (MI6). A repetitive loss area map that only contains repetitive loss areas inside the SFHA does not qualify for MI3.



### **322.e. Special flood-related hazards (MI5)**

- This additional explanation is provided for the discussion on page 320-13:

The credit for MI5 is not limited to the seven special hazards listed, nor does a community need credit for a special flood-related hazard to receive credit for advising inquirers about areas subject to the hazard.

## 330 (Outreach Projects)

### 331.a Activity Description

- Under **Messages** on page 330-3, this additional explanation is provided:

All projects (for elements OP and/or FRP) are scored based on the topics covered by the messages (Table 330-1). Projects that cover the topic of flood insurance get double credit if the community qualifies for credit under Activity 370.

- Under **Projects** on page 330-3, this additional explanation is provided:

If a project is produced in English and at least one other language, it counts as two projects. This applies to two brochures that convey the same message in different languages or the same information printed in different languages on the same brochure. There is no additional credit for having the project in more than two languages.

A website can be credited as an informational project, with a maximum of six topics, at one point each. Note that if the website qualifies for credit in element WEB under Activity 350, the community would receive more credit there (up to six points per topic) and would not also receive credit under Activity 330.

Informational material credit is provided for a DOCUMENT prepared by a county, state, or regional agency only if

- It is on display or distributed in the community. There is no credit for a regional document only on display in a regional agency's office; OR
- It is handed out at a location, such as a booth at the shopping mall or county fair, frequented by residents of all the county's communities.

### 332.a. Outreach projects (OP)

- Under **Credit Criteria for OP** on page 330-6, this additional explanation is provided for criterion (1):

Outreach projects do not have to be disseminated by the community. Any project that the community is aware of can be credited, even if it is distributed by the state, a federal agency, the local utility, a private company, or any organization.

## 340 (Hazard Disclosure)

### 342.a. Disclosure of the flood hazard (DFH)

- This additional explanation pertains to the third paragraph on page 340-3:

There is no partial credit for a state or local law providing for the disclosure of the flood hazard. State and local disclosure laws are credited in element ODR.

### 342.b. Other disclosure requirements (ODR)

- This additional explanation is provided for the introductory paragraphs on page 340-5:

ODR credit is not provided for

- A requirement for which DFH credit has been provided;
- A law that allows disciplinary action against real estate agents who do not disclose flood hazards, or
- Showing the floodplain boundaries on preliminary subdivision plats. ODR credit is provided only for disclosure on final, recorded plats.

- Under **Credit Points for ODR** on page 340-7, this additional explanation is provided:

Note that ODR = 10 for one law that has two different requirements.

## 350 (Flood Protection Information)

### 352.a. Flood protection library (LIB)

- Under **Credit Criteria for LIB** on page 350-4, this additional explanation is provided for criterion (1):

If a publication, such as the coastal publication, is not applicable to a community then full credit (10 points) may be provided.

- Under **Credit Points for LIB** on page 350-4, this chart helps explain what partial credit is available:

LIB Publications	LIB Credit Points
All 9 publications	10
All but coastal for an inland community	10
All but coastal and manufactured homes for an inland community with no manufactured homes	10
All but “Answers to Questions about the NFIP”	9
All but “Answers to Questions about the NFIP” and “Protecting Building Utilities”	8
Has state publication instead of FEMA version	creditable

### 352.c. Flood protection website (WEB)

- Under **Credit Criteria for WEB** on page 350-6, this explanatory language is added to criterion (1):

The flood information home page must be easily found using a widely used search engine by entering the community name and the word “flood,” “floodplain,” or “stormwater.” The search feature must show current community flood information first. A search feature that searches the entire internet or the community’s entire site and lists hundreds of hits that mention “flood” is not creditable.

- Under **Credit Criteria for WEB** on page 350-6, this explanatory language is provided for criterion (2):

If the community is seeking credit only for what’s on one page, that one page can be considered the directory and this credit criterion can be considered to have been met.

There is no credit for additional pages of information that are not in the directory or linked to the home page. Credit is for a conscientiously designed website, not a disparate collection of pages related to flooding.

- Under **Credit Points for WEB**, this explanatory language pertains to WEB3 on page 350-10:

The community cannot receive WEB3 credit if it has had no development, including substantially damaged and/or improved buildings, since joining the CRS.

## **360 (Flood Protection Assistance)**

### **362.a. Property protection advice (PPA)**

- Under **Credit Criteria for PPA**, this explanatory language pertains to credit criterion (3) on page 360-4:

Credit for element PPA is not available if the community only provides

- Regulation information: Code enforcement activities, including providing base flood elevations, reviewing plans, and inspecting the building while it is under construction, are minimum requirements for participating in the NFIP and are not creditable in the CRS.
- Flood data: Providing site-specific or other flood data is credited under Activity 320.
- Response to drainage complaints: Making site visits to respond to drainage complaints related to channels or storage basins is credited under Activity 540.

## 400 MAPPING AND REGULATIONS

### 410 (Flood Hazard Mapping)

#### 411.b. Activity Credit Criteria

- On page 410-7, this explanatory language about criterion (2) is provided:

In areas where a site-specific analysis is required, the ordinance language does not need to be re-adopted. The credit is for the ordinance requirement.

#### 412.a. New study (NS)

- On page 410-8, this explanatory language pertains to paragraph (2):

There is no credit for “flood elevations for a site at time of development” unless the data are required for every development project that involves construction of a building, including construction of a single-family home on an existing lot. Requiring a base flood elevation only for subdivisions is not credited.

- This additional explanation is provided for the discussion under **Credit Criteria for NS** on page 410-10:

##### **NS Credit and Flood Insurance Studies:**

Here are five circumstances in which a community may find itself, and the appropriate credit eligibility for each. These scenarios also apply to a circumstance in which FEMA issues preliminary base flood elevations.

- (1) If a community is receiving NS credit and a new FEMA-funded Flood Insurance Study produces a higher base flood elevation, the community must adopt it. The study it was getting credit for no longer has an impact on the community’s floodplain management program. The community loses its NS credit.
- (2) If the new study produces a lower base flood elevation, the community has the option of adopting it or keeping its higher regulatory flood elevations. If it adopts the new study, it loses its NS credit. If it keeps enforcing its own higher elevations, it keeps the NS credit.
- (3) If the new study incorporated the older community study, the community would keep its NS credit. For example, the new study may have used the community’s profiles but put it on a better base map.
- (4) Under any of the above scenarios, the community may still be eligible for other CRS credit under Activity 410.

(5) (Refer to the relative base flood elevations in the graphic to the right.) If a community adopts a new study with base flood elevations higher than those on the FIRM (New Study A), it receives NS credit, provided the new study was not prepared by FEMA. If FEMA prepares a new FIRM (New Study B), e.g., a county-wide FIRM, with lower base flood elevations than those on New Study A, the community has two choices:

BFE of New Study A~~~~~  
 BFE of New Study B~~~~~  
 Original FIRM's BFE ~~~~~

- Keep enforcing the higher base flood elevations of New Study A and receive NS credit; or
- Adopt the new FIRM with the lower base flood elevations (New Study B) and lose the NS credit (because adopting a FEMA-prepared study is a minimum requirement of the NFIP).

If the community adopted the New Study A study and receives NS credit and subsequently adopts a newer, non-FEMA, study with lower base flood elevations (New Study B), but higher than the original FIRM, then NS credit is still provided. This is because the community has adopted a study that has base flood elevations higher than those mandated by FEMA.

**NS vs. FRB Credit:**

A community cannot choose between NS or FRB credit for new base flood elevations that are higher than those on the FIRM. If there is a new study or profile, the only CRS credit is NS. However, if the community adopts a higher base flood elevation and has a freeboard requirement above that base flood elevation, it deserves both credits.

**NS Credit and Floodway Studies:**

- If a community requires a site-specific study in an unnumbered A Zone or X Zone, the credit is taken from line 2.a in the NS table on page 410-11. If a floodway or encroachment study is also conducted, the credit is taken from line 2.b.
- There are cases in which the FIRM has an AE Zone, but no floodway map. If the community maps a floodway (and adopts the map for regulatory purposes), the floodway study is credited under NS. The credit is the difference between the with- and without-floodway new study scores, i.e., NS lines 3 and 4. For an AE Zone, this would mean  $175 - 130 = 45$  points.
- In AE or A Zones without a floodway mapped, the community may require site-specific encroachment or floodway studies at the time of development. This is different than the previous situation in which there is a floodway map for a long reach of the stream. This credit is for a study of the site to either draw floodway lines on the parcel to be developed or determine whether the project will cause an increase in flood heights. These guidelines are to be used for four common community requirements:
  - AE Zone, run a 1-foot encroachment analysis: no credit, required by 60.3(c)(10).



- AE Zone, run a < 1-foot encroachment analysis: FWS credit only.
- A Zone, run a 1-foot encroachment analysis: NS credit of 30 points, the difference between lines 2a and 2b for A Zones.
- A Zone, run a < 1-foot encroachment analysis: NS AND FWS credit.

□ Under **Credit Criteria for NS** on page 410-10, this explanatory language is provided for criterion (2), small-scale studies:

If a community requires all new construction in X or approximate A Zones to be elevated to an historical flood level or past high-water mark, it will be scored as “1. Delineation of an approximate A Zone.” There is no credit if this applies only to subdivisions of 50 lots or five acres or greater in A Zones.

This regulatory elevation is not a base flood elevation and should not be used in B9 of the Elevation Certificate. Section E of the Elevation Certificate should be used for construction in approximate A Zones where there is no base flood elevation determined by an engineering study (unless the FEMA Regional Office states that the elevation used can be considered a flood study for the purposes of CRS credit).

If the community requires all new construction in an AE Zone to be elevated to an historical flood level or past high-water mark that is higher than the base flood elevation shown on the FIRM, it will be scored as “3. New profile or length of shoreline.” This should be considered as a community-determined base flood elevation and also should be entered in B9 of the Elevation Certificate.

□ Under **Credit Criteria for NS** on page 410-10, this explanatory language is provided for criterion (3), study elevations:

If a flood control project is built to protect an area mapped as unnumbered A Zone, and the new study shows a smaller floodplain with base flood elevations, credit is still provided. Even though the horizontal dimension of the floodplain decreased, base flood elevations were provided to FEMA where there were none previously.

### **412.c. State review (SR)**

□ The following additional background information is provided for the discussion on page 410-16:

Credit is not given for the standard engineering practice of an internal review by the company doing the study or by the community or entity paying for the study (including a review by (or paid for directly or indirectly) by FEMA).

## 420 (Open Space Preservation)

### 422.a. Open space preservation (OSP)

- Under **Credit Criteria for OSP** on page 420-4, the following additional information applies to credit criterion (2)(a):

In most cases, a manmade lake would qualify for OSP credit because it used to be land ripe for development and now it is not. If a detention basin or reservoir has more than 10 acres of water, it is not counted toward aSFHA, so it is not counted toward aOSP. This prevents large reservoirs from being credited as open space.

- Under **Credit Criteria for OSP** on page 420-6, the following additional information applies to credit criterion (3)(c):

Often a land use plan identifies publicly owned properties that are already in open space, in which case OSP credit is based on ownership, not a regulation.

In some states, land use maps or land use plans may have the same authority as an ordinance.

A setback requirement or buffer zone usually restricts development within a certain distance landward of a body of water or a property line. If the restriction is strict enough to prohibit all buildings, filling, and paving, vacant land subject to the requirement can be counted toward OSP.

A setback requirement may receive credit under only one element: OSI, OSP, or DL. There is no duplicate credit.

Saltwater marshes can qualify as open space, but only when it is verified with the community that within those areas all development (buildings, fill, and storage) is prohibited.

### 422.c. Natural functions open space (NFOS)

- Under **Credit Criteria for NFOS** on page 420-15, the following additional information applies to credit criterion (2):

- The fact that an area is used by, or has been improved by or for, hunters does not disqualify it from NFOS1 credit.
- Although a property, especially a dune or beach, may appear to be an open space parcel in its natural state, it does not receive NFOS1 credit if it is heavily traveled. Recreation areas with parking lots, concession stands, lifeguards, etc. are not eligible for NFOS credit. However, there is an educational benefit to allowing foot

traffic, so trails, sidewalks, walkways over dunes, and other measures to support pedestrians do not adversely affect NFOS1 credit.

- Management of invasive species within a natural area does not disqualify the land from receiving NFOS1 credit.

#### **422.f. Open space incentives (OSI)**

- Under **Impact Adjustment for OSI** on page 420-26, the following additional information applies to credit criterion (2):

In instances in which a community has a regulatory floodplain larger than the SFHA, the OSI impact adjustment can be greater than 1.0 (but cannot exceed 1.5 when combined with the impact adjustment for OSP). This is the same as allowed under Activity 430.

- Under **Impact Adjustment for OSI** on page 420-26, this note about prorating is provided:

In a few instances the credit for OSI may be prorated rather than subject to an impact adjustment:

- If the community's open space incentives apply to new development but not to redevelopment, then the community may receive 67% of the OSI credit for the pertinent regulations.
- If a community has no vacant land suitable for a subdivision or other large development and the ordinance does not clearly state that it applies to redevelopment projects, then the community must provide a statement from its attorney that the regulations apply to redevelopment projects. If the statement is provided, then the community will receive 33% of the OSI credit for the pertinent regulations.

If such a community does not submit the statement that the regulations apply to redevelopment, the optional minimum impact adjustment of 0.1 will be applied to the credit.

- "No vacant land suitable for a subdivision or other large development" is a subjective term and depends on the density of development allowed in the zoning district. Most OSI regulations have no impact on vacant lots in existing subdivisions.

### **422.g. Low-density zoning (LZ)**

- The following additional information applies to credit criterion (1) under **Credit Criteria for LZ** on page 420-28:

Some communities may restrict the density of development through a means other than zoning. These regulations may receive LZ credit provided that they

- Specify a minimum lot size or minimum number of buildings per acre, and
- Are not temporary. An example would be an ordinance that requires a minimum lot size to allow for a septic system, but only until such time as sewer lines are constructed in the area. This temporary regulation would not be eligible for LZ credit.

- The following additional information applies to credit criterion (2) under **Credit Criteria for LZ** on page 420-29:

Full credit for DL2 and LZ is mutually exclusive. If the community's regulations do not prohibit all buildings and DL2 is prorated, then the community may also receive credit for LZ.

### **422.h. Natural shoreline protection (NSP)**

- Under **Credit Criteria for NSP** on page 420-30, the following additional information applies to credit criterion (2):

A buffer or building setback requirement is not sufficient for NSP credit for protecting shorelines. The NSP credit is for not disturbing shorelines, stream channels, and their banks. No construction or ground disturbance may be allowed below the top of the bank to receive NSP credit.

## 430 (Higher Regulatory Standards)

### 432.a. Development limitations (DL)

- The following additional information applies to credit criterion (1)(a) under **Credit Criteria for DL** on page 430-7:

There is no credit when projects designed primarily to prevent channel erosion are exempt from the community's prohibition of fill.

- The following additional information applies to credit criterion (1)(b) under **Credit Criteria for DL** on page 430-8:

The community's ordinance must require that the lost storage be compensated at hydraulically equivalent sites. Simply requiring that the same volume be preserved is not sufficient for CRS credit.

Additional credit is given in element DL1b for compensatory storage ratios greater than 1:1. There are additional compensatory storage credits in elements FRB and FDN. They do not provide additional credit for higher ratios.

Buildings not built on fill that have properly vented crawlspaces are not required to be included as fill.

The following common ordinance provisions are not eligible for either DL1 credit:

- The standard NFIP language that prohibits increases in flood heights in floodways.
- The statement of purpose of an ordinance.
- Regulations that prohibit loss of storage if it adversely affects others, or if a community permit reviewer thinks it may cause a problem.
- Subdivision regulations that do not apply to all new development.
- Building regulations that apply only to buildings, but not bridges, highways, parking lots, or other floodplain uses.
- Stormwater management regulations that require a developer to compensate for any increase in runoff his development will create. This provision may be creditable in element SMR under Activity 450.

A community may not receive credit for element DL1b if it protects storage capacity only in floodways. The minimum NFIP requirement that prohibits encroachments in floodways generally preserves the storage that floodways provide. DL1b is primarily effective in fringe areas of riverine floodplains.

Element DL1a credit is not provided for prohibiting fill for the construction of buildings in V Zones because such a prohibition is a minimum NFIP requirement. However, element DL1a credit may be prorated if the community prohibits fill for other purposes (roads, culverts, bridges, parking lots) in V Zones, because that benefits natural floodplain functions.

DL1b credit is not provided in V Zones or coastal A Zones because compensatory storage has no impact on coastal flood heights and it also can adversely affect natural functions.

- The following additional information applies to credit criterion (2) under **Credit Criteria for DL** on page 430-8:

The table below shows the DL prorating that is appropriate in the given circumstances.

Prorating DL Credit			
Type of Building Prohibited	Points before Impact Adjustment	Impact Adjustment Map	Notes
Buildings (including substantial improvements,) prohibited	1000	Must also show residential zoning areas of SFHA.	No CLOMR-Fs or LOMR-Fs allowed.
	100		If CLOMR-Fs or LOMRs are signed by community. The 75-25 rule used for FRB is not applied here.
Residential buildings prohibited	500	Must also show mobile home zoning areas of SFHA.	No CLOMR-Fs or LOMR-Fs allowed.
	50		If CLOMR-Fs and LOMRs are signed by community.
Non-farm residences or mobile homes prohibited	250	Must also show zoning for non-agricultural areas of SFHA	No CLOMR-Fs or LOMR-Fs allowed.
	25		If CLOMR-Fs or LOMRs are signed by community.
New buildings prohibited, but substantial improvements and substantial damage allowed. (Alternative option is to map undeveloped areas of the regulatory floodplain, and apply impact adjustment (undeveloped area) to the 1,000 points.)	500	Must have impact adjustment map	No CLOMR-Fs or LOMR-Fs allowed.
	50		If CLOMR-Fs or LOMRs signed by community.
	10	When no impact adjustment map	Or for fully developed barrier islands.
New buildings and substantial damage prohibited, but substantial improvements allowed.	750	Must have impact adjustment map	No CLOMR-Fs or LOMR-Fs allowed.
	75		If CLOMR-Fs or LOMRs signed by community.
	15	When no impact adjustment map	Or for fully developed barrier islands.

- Under **Credit Points for DL** on page 430-9, the following additional information applies to the formula for DL3:

Credit can be received under only one of three sub-elements:

- (a) Prohibition of all materials (DL3a): Full credit (50 points) for is for prohibiting outdoor storage of all materials in the SFHA.
- (b) Prohibition of hazardous materials (DL3b): Partial credit (20 points) is provided if only hazardous materials are prohibited (indoors or outdoors).
- (c) Storage of hazardous materials (DL3c): Partial credit (10 points) is provided if hazardous materials are allowed to be stored indoors in the floodplain, but must be elevated above the base flood elevation.

The community may exempt small amounts of hazardous materials for household use and still receive the specified partial credit for DL3b (20 points) or DL3c (10 points). The exemption would be limited to five gallons (each) of commonly used items, such as gasoline, propane (for outdoor grill), paint, or lawn and garden chemicals. Propane (for other than an outdoor grill) or fuel storage tanks of any size cannot be exempted and still receive credit.

- Under **Credit Points for DL** on page 430-10, the following additional information is provided:

A community cannot get credit for both DL1 and FDN for the same area. Areas credited must be mutually exclusive.

There is no credit for LZ in areas with full credit for DL2, with or without LOMR-Fs. If DL2 credit is prorated then areas eligible for LZ credit can also receive LZ credit.

The prohibition of illicit and hazardous material is a standard part of all NPDES ordinances and is not by itself sufficient for credit.

If ordinance language requires the elevation of hazardous materials above the base flood elevation, but does not specify whether they have to be indoors or not, 5 points are provided under DL3c.

Five points of DL3 credit can be provided to a community that requires anchoring of tanks and elevation of other materials or storage indoors. The NFIP standards are silent on this issue. An example would be a community that requires gas containers to be elevated and anchored at least three feet above the base flood elevation, or buried below grade and anchored to reinforced concrete footings.

- The following additional information about credit criterion (3) is provided for the discussion under **Impact Adjustment for DL** on page 430-10:

If a community has no vacant land and it wants credit for DL1 or DL2 regulations, and the ordinance does not clearly state that it applies to redevelopment projects, then it must provide a statement from its attorney that the regulations apply to all redevelopment projects.

If the statement is provided, then the community will receive 33% of the credit for regulations that apply to redevelopment but have no impact on new development (because there is no land available for new development).

If a community has very little developable land and it does not provide an attorney's statement that the regulations apply to redevelopment, the impact of the regulations is very small. The optional minimum impact adjustment of 0.1 is used.

### **432.b. Freeboard (FRB)**

- Under **Credit Criteria for FRB** on page 430-11, the following additional information and example are provided:

**NS vs. FRB credit:** A community cannot choose between credit for element NS (under Activity 410) or credit for FRB for new base flood elevations that are higher than those on the FIRM. If there is a new study or profile, the only CRS credit provided is NS. However, if the community adopts a higher base flood elevation and has a freeboard requirement above that base flood elevation, it deserves both credits.

**FRB credit when substantial improvement is not enforced.** FRB credit may be provided for an ordinance that requires freeboard for new buildings constructed in the SFHA, but does not require freeboard for substantial improvements. FRB credit is applied for the level of freeboard multiplied by the optional minimum impact adjustment (Section 402.b. and Section 403). For example, if the ordinance requires 2 feet of freeboard, credit would be:  $225 \text{ points} \times 0.10 \text{ impact adjustment} = 22.5 \text{ points}$ .

Two things are assumed: (1) that the definition of substantial improvement includes substantial damage, and (2) that with two feet of freeboard substantial improvement of buildings already at the base flood elevation may remain at base flood elevation. However, if all substantial improvements would need to be elevated to one foot above base flood elevation (new buildings to two feet), including mechanical/electrical equipment, then the FRB credit is verified at one foot multiplied by the calculated impact adjustment.

**No permit record:** A community can receive FRB credit if there has been no new construction or substantially improved or substantially damaged buildings in the SFHA since the freeboard ordinance was passed.

**Nonexistent zones:** Some FEMA regional offices and some states want community ordinances to reflect all parts of their models. If the community has ordinance language for



types of areas that do not occur within its jurisdiction, and therefore have no freeboard requirement, the community still may receive full credit.

**Example:** Smallville's ordinance requires freeboard in the AE Zone but not in unnumbered A zones. Smallville has one river and it is mapped as AE. There are no unnumbered A zones in Smallville. Smallville receives full credit for requiring freeboard in all the community's regulatory floodplain.

- Under **Credit Criteria for FRB** on page 430-12, the following additional information and example are provided about criterion (2)(f), elevating utilities:

If a community has different freeboard levels for the lowest floor and mechanical/electrical equipment, full credit will be provided for the portion above the base flood elevation to which that both lowest floor and mechanical/electrical equipment must be elevated and 75% credit for any additional lowest-floor freeboard that is required without the mechanical/electrical equipment also having to be at the same height.

**Example:** A community has a freeboard regulation of 3 feet, but mechanical/electrical equipment is only required to be 1 foot above base flood elevation. The first foot of freeboard would be scored at 100% since lowest floor and mechanical/electrical equipment have to be at that elevation (100 pts. x 100%), but then the remaining 2 feet of freeboard is applied at 75% of the credit (275 pts. x 75%).

In this example, no fill restrictions apply. The prorated credit for FRB, applied before impact adjustment, would be: (100 points x 100%) + (275 points x 75%) = 100 + 206.25 = 306.25 points.

- Under **Credit Criteria for FRB** on page 430-11, the following additional information and example are provided about criterion (2)(d), stem walls:

There is no additional credit in FRB for a compensatory storage ratio greater than 1:1. Such credit is only provided in DL1b.

- Under **Impact Adjustment for FRB** on page 430-13, the following additional information is provided about criterion (1), exclusions from FRB credit:

If a community does not have a regulatory floodplain then there is no FRB credit.

If a community requires LOMR-Fs for all new development in the SFHA, then all those areas where LOMR-Fs are required are excluded from credit for FRB.

□ Under **Impact Adjustment for FRB** on page 430-13, the following additional information is provided about criterion (2), freeboard requirements varying within the community:

**Freeboard for residential structures only:** If the community’s freeboard requirement applies only to residential structures, the regular impact adjustment factor, rFRB, is multiplied by 50%. A typical example is  $rFRB = (1.0 - rOSP) \times 0.5$ . A community may provide a building count or zoning map to request a higher credit.

**A Zones:** If the community requires a base flood elevation in unnumbered A Zones element NS under Activity 410), and requires freeboard above that base flood elevation, FRB credit can be provided. If the community requires use of best available data, in order to receive credit it must show on a map where base flood elevations are available and where freeboard is required.

The base flood elevation can be determined by using the techniques explained in *Managing Floodplain Development in Approximate A Zones* (FEMA-265). The “detailed method,” using engineering techniques, must be used for credit.

**Unnumbered A Zones:** If a community requires the lowest floor to be between two and four feet above the highest adjacent grade in unnumbered A Zones, 28 points of prorated FRB credit can be awarded. This credit is subject to an impact adjustment. Note that this standard does not meet the Class 4 freeboard prerequisite.

**Manufactured home parks:** If a community has manufactured home parks and does not require freeboard in them, rFRB cannot be 1.0 because the regulation is not enforced everywhere. Most likely the area not covered would be small, so the impact adjustment ratio will be reduced by 5%. In those cases, the regular impact adjustment factor, rFRB, will be multiplied by 0.95. A typical example is  $rFRB = (1.0 - rOSP) \times 0.95$ . The actual percentage may be use if an actual measurement of the areas of the affected manufactured home parks is available.

**DL2, LOMR-Fs and FRB:** If a community only allows development in the SFHA via LOMR-Fs, then the properties are removed from the SFHA, and are removed from aFRB.

□ The following additional information is provided for the discussion under **Documentation for FRB** on page 430-16:

To receive full credit for FRB, the ordinance must have a freeboard requirement for all situations. If, for any of the following categories, freeboard above the base flood elevation is not required, then rFRB must be less than 1.0.

- Residential properties where base flood elevations are shown on the FIRM;
- Non-residential properties where base flood elevations are shown on the FIRM (elevation and floodproofing);

- Approximate A Zones and V Zones where base flood elevations are not shown on the FIRM and engineering studies are not required of ALL development;
- Manufactured housing;
- New manufactured homes in an existing manufactured home park;
- Utilities, including ductwork; and
- AO Zones.

### **432.c. Foundation protection (FDN)**

- Under **Credit Criteria for FDN** on page 430-17, the following additional information is provided about criterion (2)(c):

There is no additional credit in FDN for a compensatory storage ratio greater than 1:1. Such credit is only provided in DL1b.

- Under **Credit Criteria for FDN** on page 430-17, the following additional information is provided about criterion (3)(b):

A requirement for soil testing does not qualify for FDN credit.

The following compaction language is acceptable for FDN2 and FDN3:

The fill shall:

- Be placed in layers no greater than twelve inches before compaction,
- Extend at least ten feet beyond the foundation before sloping below the flood protection elevation, and
- Be protected against erosion and scour during flooding by vegetative cover, riprap, or other structural measure.

- Under **Impact Adjustment for FDN** on page 430-17, the following additional information is provided:

There is no credit for FDN in the coastal A Zone when the community is receiving CAZ credit for enforcing V Zone standards in the coastal A Zone.

A community cannot receive credit for both DL1 and FDN for the same area. The areas credited must be mutually exclusive.

### **432.d. Cumulative substantial improvements (CSI)**

- On page 430-18, a new subsection is added:

#### **Credit Criteria for CSI**

(1) The activity credit criteria in Section 431.b must be met.

- Under **Credit Points for CSI**, the following additional information is provided about item (3) in the formula box on page 430-19:

This credit is for regulatory language that qualifies properties for ICC coverage for repetitive losses.

ICC claims can be paid when buildings are determined by the community building official to be repetitively damaged or a repetitive loss structure according to the local floodplain management laws. The community must adopt and uniformly enforce a repetitive loss provision or a cumulative substantial damage provision in its floodplain management laws or regulations. These provisions require the repair of repetitive loss structures to meet the floodplain requirements. For ICC eligibility a repetitive loss structure must meet ALL of the following;

- It must be covered by a NFIP insurance policy;
- It must have suffered flood damage on at least two occasions in a 10-year period ending on the day of the second loss;
- The cost to repair the flood damage, on average, must have equaled or exceeded 25% of the market value of the building at the time of each of the two flood losses, or CUMULATIVELY TOTAL 50% OF THE PRE-FLOOD MARKET VALUE (a value less than 50% for substantial damage does not qualify for ICC), as defined by the local floodplain ordinance; and
- In addition to the claim requesting ICC, the NFIP must have paid a previous qualifying claim.

### **432.e. Lower substantial improvements threshold (LSI)**

- This additional explanation is provided for the discussion on page 430-19:

Some ordinances appear to have a threshold of zero because they prohibit all improvements. However, they often have language that allows minor projects (e.g., valued at less than 10%) over a 12-month period. In those cases, the credit for LSI is zero because, without a cumulative substantial improvement requirement, the building could be improved more than 50% in six years.

- On page 430-20, a new subsection is added:

### **Credit Criteria for LSI**

- (1) The activity credit criteria in Section 431.b must be met.

### **432.f. Protection of critical facilities (PCF)**

- On page 430-21, this additional background is provided:

If a community has regulatory language that prohibits hazardous materials storage, credit is provided under DL3.

Communities receive PCF1 credit for prohibiting critical facilities in all or portions of the 500-year floodplain. If a community prohibits critical facilities from the 500-year floodplain, but allows exceptions for one or two types of critical facilities (e.g., fire stations, police stations), then the community may receive 50% of the PCF1 credit.

If the community requires protection to the 500-year flood level plus one foot and requires dry land access to high ground, then the credit for PCF may be increased by 50%.

Communities that use the I-Codes definition of critical facilities for Category III and IV buildings and adopt the ASCE provisions to regulate those critical facilities can receive two-thirds (67%) credit since some critical facilities (such as schools) are excluded from being protected to at least the 500-year flood level. This amounts to 13 points of PCF2 credit when applying protection to the 500-year flood level ( $20 \times 0.67 = 13$ ).

- Under **Credit Points for PCF** on page 430-22, the following additional information is provided pertaining to PCF1:

Prorating applies only to types of facilities within the 500-year floodplain. If the standards apply only to certain areas, such as the floodway or the SFHA, the impact adjustment is used to modify the credit.

- Under **Credit Points for PCF** on page 430-22, the following additional information is provided about PCF2:

The minimum protection level for PCF2 is the 500-year flood elevation:

- If an ordinance sets the protection level at the 500-year flood level plus one foot of freeboard, full credit is provided. If the ordinance only applies to the SFHA, the credit is adjusted through the impact adjustment.
- Half credit is provided if the protection level is set to the 500-year flood level (no freeboard) and the impact adjustment is applied.
- No credit is provided if the protection level is below the 500-year flood level.

**PCF2 credit with base flood elevation as reference:** When an ordinance references the base flood elevation instead of the 500-year flood elevation for protecting critical facilities, half of the PCF2 credit (20 points) is provided if the flood protection level is set to three feet higher than the base flood elevation. For CRS purposes, this is considered to be equivalent to the 500-year flood elevation. No credit is provided if the protection level is below this standard.

PCF2 credit with BFE freeboard or with FRB credit:

- If the community can demonstrate that protecting critical facilities to the BFE plus some freeboard results in protection to or above the 500-year flood elevation (when the ordinance references the base flood elevation instead of the 500-year elevation), appropriate PCF2 credit can be provided.
- If the community has a freeboard requirement for all buildings that is credited under FRB, there is no additional PCF credit simply because the resulting protection level is above the 500-year flood elevation. The community will receive more credit under FRB than under PCF and there is no double credit for the same regulation.
- However, if the community's ordinance requires freeboard for all buildings AND a freeboard for critical facilities that exceeds the freeboard for all other buildings, then credit for both FRB and PCF may be provided.

**PCF2 credit and I-Codes:** Communities that use the I-Codes' definition of critical facilities for Category III and IV buildings and adopt the ASCO provisions to regulate those critical facilities can receive two-thirds (67%) of PCF2 credit if some critical facilities (such as schools) are excluded from being protected to at least the 5--]year flood level.

- Under **Impact Adjustment for PCF** on page 430-22, the following additional information about the 500-year floodplain is provided:

If the community does not regulate critical facilities throughout the 500-year floodplain, it may still receive partial credit through the impact adjustment. Note that the 500-year floodplain shows on the FIRM as the A AND B (or shaded X) Zones. An ordinance that prohibits critical facilities in the floodway, SFHA, or V Zone would receive credit, but rPCF would not be 1.0.

### **432.g. Enclosure limits (ENL)**

- Under **Credit Criteria for ENL** on page 430-24, credit criterion (2), the following additional information is provided about enclosure limits more than four feet above the ground:

For floors above four feet, what counts is how high the building will be above the ground. If it is over four feet, the community must enforce its enclosure limits to receive ENL credit,

regardless of the base flood elevation at the site. If the community enforces its enclosure limits for any the building that is four or more feet above grade, then  $rENL = 1.0$  (even if the base flood elevation is only two feet deep). Ordinance language that allows enclosures higher than five feet disqualifies the community from receiving ENL credit.

Some communities have regulations that require non-conversion agreements for openings in crawlspaces, regardless of how high the lowest floor is. This prevents alterations to the openings and is a good practice. In the CRS, credit for such regulations is provided in element OHS.

### **432.o. Other higher standards (OHS)**

- Under **Credit Points for OHS** on page 430-53, the following clarifies OHS credit determination.

Credit for a regulation that has a higher standard than the NFIP criteria and that is not credited elsewhere is submitted for review. Approval of OHS credit and the credit determination are made by FEMA. FEMA may approve new OHS credit at any time.

### **432.q. Regulations administration (RA)**

- Under **Credit Criteria for RA**, criterion (1)(c) on page 430-56, the following additional explanation is provided about credit for multiple EMI classes:

Staff members that have taken the same creditable EMI class two different times do not receive additional credit under 432.q(1)(a). However, they can earn credit for two different classes, or for being a CFM and taking an EMI class (any classes but the basic NFIP course (E273)).

- Under **Credit Criteria for RA**, criterion (5) on page 430-55, the following additional explanation is provided about offsite records storage:

There is no RA5 credit if the only records being protected are Elevation Certificates.

- Under **Credit Points for RA** on page 430-59, the following additional explanation is provided:

If a community requires only the inspection of flood openings at the point of sale/rental of an existing home, instead of all compliance elements, it may receive half credit (8 points).

## 440 (Flood Data Maintenance)

### 442.a. Additional map data (AMD)

- Under **Impact Adjustment for AMD** on page 440-6, the following additional explanation is provided:

The impact adjustment ratio for AMD can go up to 1.5 if a community's program includes regulated floodplains outside the SFHA.

### 442.b. FIRM maintenance (FM)

- Under **Credit Points for FM** at the bottom of page 440-8, the following additional explanation is provided:

A community may receive 8 points for FM1 if it can produce all of its FIRMs, even if it cannot produce its Flood Insurance Studies or Flood Boundary Floodway Maps.

Although a community that has not had its FIRM revised cannot receive the 12 points for FM1, it can receive FM2 credit if it retains copies of its Flood Hazard Boundary Maps.

If the community joined the NFIP before 1974 and never got a Flood Hazard Boundary Map, it does not qualify for FM2 credit.

### 442.c. Benchmark maintenance (BMM)

- Under **Impact Adjustment for BMM** on page 440-12, the following additional explanation is provided:

**Undevelopable areas:** If a portion of the community's floodplain is not within one mile of a qualifying benchmark, and that area also is undevelopable, a modified impact adjustment may be used and that area eliminated from consideration. "Undevelopable" means the area is dedicated open space or there is some other reason to believe it will never be developed. The definitions for "low-density zoning" under Activity 420 and/or for "developed areas" for element CDR under Activity 540 ARE NOT TO BE USED for this element. If a community's policy is to "stay ahead of development," then a modified impact adjustment may be available for an undevelopable area, subject to the decision of an ISO/CRS Technical Reviewer.



## 450 (Stormwater Management)

### 451.a. Activity Description

- On page 450-3, the following additional explanation is provided:

Watershed plans that are produced to meet U.S. Environmental Protection Agency requirements or to comply with NPDES permit standards rarely qualify for WMP credit because they do not address the increase in flow caused by new development. Here are some notes on the relationship between stormwater management regulations (SMR) and watershed master plans (WMP).

- Using stormwater management regulations to require on-site detention/retention is creditable in SMR without a watershed master plan.
- A watershed master plan or similar plan is a prerequisite for any SMR credit that does not involve the standard on-site detention/retention regulations (e.g., developers pay fees for a regional facility or some developments are exempt from the regulations due to their location within the watershed).
- Credit for WMP is dependent on the community's having a model of its drainage system for current and fully developed land use and at least the predicted 100-year rainfall event. In addition, the community must develop a plan to mitigate any increases in flows from the design event(s).
- Credit criteria for the development of WMP-creditable plans for coastal communities that examine the impacts of sea level rise on the community include this:
  - The community must look at the impacts of predicted sea level rise in the year 2100 on its drainage system during a 100-year event. It then must propose solutions to these predicted impacts, which can include monitoring of performance and suggested long-term improvements. No credit is provided for simply showing the limits of sea level rise using a mapping tool.

### 452.a. Stormwater management regulations (SMR)

- On page 450-5, the following additional explanation is provided:

SMR determines the design standards for new onsite stormwater management detention and retention facilities, and PUB authorizes inspection and maintenance when required on those facilities by the community. The term “stormwater facility” is commonly equated with retention or detention basins. For CRS purposes, the term does not include underground storm drains or constructed channels. In general, regulations developed to comply with a

community's NPDES permit do not qualify for credit, because they target water quality and not the quantity of flow.

Credit can be verified for either peak flow control (most common), volume control (less common), or both. The scoring will depend upon the requirements of the community and how those standards are implemented as shown in the drainage reports the community submits for documentation.

- Under **Impact Adjustment for SMR** on page 450-11, the following additional explanation is provided:

If the community does not have the same standards throughout its jurisdiction, the lowest creditable standard will be used to determine credit unless the community prepares an impact adjustment map and calculates the area for each relevant set of standards.

#### **452.d. Water quality regulations (WQ)**

- On page 450-20, the following additional explanation is provided:

The National Pollutant Discharge Elimination System (NPDES) permit program was designed to improve the water quality of stormwater runoff in accordance with the federal Clean Water Act. The purpose of the NPDES Phases I and II is to develop, implement, and enforce stormwater management programs and practices that reduce polluted runoff to local waterways. Infrequently there is some overlap between a community's NPDES activities and activities that receive CRS credit for stormwater management.

- There is no automatic WQ credit for meeting the minimum requirements of the NPDES program. NPDES allows a state or a community to design how it will meet its pollution control targets. That may or may not include regulations requiring new stormwater management facilities to incorporate practices to improve water quality.
- There is no automatic credit for meeting state NPDES requirements. A state's program may qualify for credit, but local implementation must be verified.

- Under **Credit Criteria for WQ** on page 450-21, the following additional explanation is provided about criterion (1) , requiring specific ways of measuring water quality:

As part of the mapping and regulations series, WQ credit is based on what is required of a developer, not other water quality activities a community may be undertaking. Examples of non-credited activities include

- Sweeping streets,
- Agricultural practices to reduce erosion,
- Daylighting streams, and
- Public information programs to educate contractors or property owners.

## 510 (Floodplain Management Planning)

### 512.a. Floodplain management planning (FMP)

- Under **Background** on page 510-2, this additional explanation is provided:

**Multiple plans:** A community may only receive credit for one plan. If it has more than one plan adopted, it may choose the plan for which it wishes to receive credit. The annual progress report must be prepared for the credited plan.

**FEMA extension:** The FEMA Regional Office has authority to extend the deadline a community has to complete its floodplain management plan. The letter or email granting such an extension must be documented.

**New CRS applications:** A new application to the CRS can be reviewed and verified if the floodplain management plan is not yet adopted, but the draft plan must have been submitted to the state and FEMA Regional Office. The final CRS verification report cannot be completed until an acceptable plan has been adopted. However, communities may adopt a plan before receiving state and FEMA approval. If a new application is submitted but the community has no plan, the community may complete a repetitive loss area analysis for RLAA credit, which can be a more expeditious way of meeting the repetitive loss prerequisite for CRS participation.

**Class improvements:** If a Category C community wants to improve a class, it cannot do so until it meets the current criteria. When it has adopted its new or updated plan (or repetitive loss area analysis), then it can apply for a modification.

**Class 4 prerequisite:** If a Class 5 community has the points to become a Class 4, but does not meet the planning prerequisite, it cannot do so until it meets the current criteria. The fact that the Class 4 prerequisites changed does not provide a grace period, since the community will not lose its class.

**Coordinator's Manual changes:** If there is a change in the minimum requirements for Activity 510 and a community has already passed a step, the community can continue under the previous schedule. The community will not be penalized for missing a new requirement provided that it can document that the planning process has started. An example of such documentation would be the minutes of the planning committee meetings. However, the community should check the current schedule before it starts the planning process.

- Under **Credit points for FMP Step 1** on page 510-6 and under **Credit points for FMP Step 2** on page 510-10, this additional explanation is provided:

If a committee was involved in the development of the original plan but there was no committee involved in the update process, the community loses the credit for using a committee.

- Under **Step 1. Organize to prepare the plan** on page 510-6, this additional explanation is provided:

CRS credit is for actually planning how to conduct floodplain management, not just preparing a document. The CRS provides credit to the community every year, so it is important that the community looks continuously at its flooding situation, evaluates what is being done about it, and ensures that its activities are still pertinent. Therefore, there are requirements for annual evaluations and five-year updates.

Although there is no requirement that the community use a committee for its planning process, committees have proven to be so valuable that a lot of points are provided for using one. If the community drops the committee from its ongoing planning processes and updates, it will lose a lot of points. Without those points, the community may not receive the 50% of the points in that step and therefore, would not meet the prerequisite to be a Class 4 or better. This all relates to the fact that the community has a choice—to meet the minimum criteria for floodplain management planning or to do a better job, get more points, and be eligible for one of the best CRS Classes.

If a committee was involved in the original plan but no committee was involved in the update process, the community loses its committee credit. If there was a committee credited in the original plan, and a new committee was created and used in the update of the plan, it would be scored according to the current credit. If there was no committee in the original plan, but a committee was formed in the update of the plan, it would be scored according to the current credit.

- Under **Step 7. Review possible activities** on page 510-18, this additional explanation is provided:

Figure 510-4 of the *Coordinators Manual* lists the six mitigation categories used in scoring Steps 7 and 8. This list is not meant to be all inclusive: there may be mitigation measures not listed that may be creditable in Steps 7 or 8. However, the six categories do not change.

- Under **Five-year update** on page 510-27, this additional explanation is provided about updating the plan:

Plan updates are due five years from either the date of local adoption, the date of final FEMA approval (not FEMA approval contingent upon local adoption), or the date of state approval (in some states).

When a community does its five-year update, its plan is scored under the schedule currently in effect or the schedule in effect when it started its update process. The ISO/CRS Technical Reviewer will provide a score for updated plans.

If a community has an acceptable plan, it does not have to revise or update it for five years even if there is a change in the *Coordinator's Manual*. After five years, however, it will have to do an update and meet the current criteria. The Class 4 prerequisite will not be waived because a community has an old plan, unless that plan had 50% of the points under the previous schedule. At the next cycle, that plan must be brought up to the current standards.

- Under **Impact Adjustment for FMP** on page 510-28, this additional explanation is provided about pro-rating:

The ISO/CRS Technical Reviewer will adjust the value of rFMP between 0.25 and 1.0 based on the building count, area of the SFHA, or watershed area.

### **512.b. Repetitive loss area analysis (RLAA)**

- Under **Credit Criteria for RLAA** on page 510-30, this additional explanation is provided for credit criterion (1) about what constitutes a creditable repetitive loss area:

A community may receive RLAA credit for an analysis of a repetitively flooded area, PROVIDED THAT the area includes properties that meet the NFIP's definition of repetitive loss. Such properties would have incurred two or more losses of \$1,000 or more over a 10-year period but were not insured or did not file a claim during both floods. The properties being addressed are considered repetitive loss properties "in waiting." Other local definitions of repetitive losses do not qualify for RLAA credit.

If a community receiving RLAA credit has mitigated all of its repetitive loss problems, RLAA credit can continue, provided that

- It is verified that all properties in the designated repetitive loss areas have been mitigated, not just those on FEMA's list, and
- The community submits the required annual reports.

## **520 (Acquisition and Relocation)**

### **521.b. Activity Credit Criteria**

- On page 520-4, under criterion (8), this additional explanation is provided about projects that are not creditable because they are an NFIP requirement:

Credit can be provided if the buildings were substantially damaged. Clearing those buildings from the floodplain exceeds the NFIP requirement that such buildings be brought up to post-FIRM condition.

## 530 (Flood Protection)

### 531.b. Credit Criteria

- On page 530-3, under criterion (1), this additional explanation is provided:

For all elements in this activity, credit is based on the lowest level of protection provided for the entire building, including the attached garage, if any.

- On page 530-4, under criterion (5)(d), this additional explanation is provided about projects that are not creditable because they are an NFIP requirement:

If a house is substantially damaged, the minimum NFIP regulations require it to be elevated and, therefore, there is no CRS credit provided. If a higher local standard, such as a cumulative substantial improvement requirement (element CSI) or a lower substantial improvement threshold (element LSI), triggered the retrofitting before the NFIP requirement would, then CRS credit is available. However, if the only higher local standard is one that does not trigger a substantial improvement, such as a freeboard rule, there is no CRS credit because the retrofit was triggered by an NFIP requirement.

Increased Cost of Compliance funds are available when a community's ordinance requires a flood-damaged building to be elevated or otherwise brought into compliance. If ICC funds are involved, it means that the project was triggered by substantial damage, so no CRS credit is provided. In some cases, the ICC-funded project may have been triggered by the community's higher repetitive loss standard, such as a lower threshold for substantial improvement or a cumulative standard. In those instances, the project receive CSI or LSI credit under Activity 530. Note that the community also may receive CSI credit for adopting the ICC repetitive loss language.

If a building that is included on the National Historic Register or a state's historic preservation list is substantially damaged and mitigated, then the building can receive credit under Activity 530. The NFIP regulations do not require that substantially damaged historic building be mitigated.

- On page 530-5, under criterion (5)(e), this additional explanation is provided about instances in which a structure is demolished:

A voluntary demolition of a building and subsequent rebuild on the same property in order to mitigate the flood hazard to the building ("demo/rebuild") may receive CRS credit under Activity 530. The new building must be completed (e.g., received a final Elevation Certificate) before Activity 530 credit is provided. The demolition of a substantially damaged building DOES NOT receive credit under Activity 530. If a building is demolished, the property sold, and a new home constructed on the site, Activity 530 credit IS NOT available because this is considered redevelopment of the property.

If a building is voluntarily replaced with a new building constructed to post-FIRM standards (“replacement building”), it can be counted for Activity 530 credit. For CRS purposes, there is no difference between retrofitting a sub-standard building and replacing it with a building built to current standards.

- On page 530-5, under criterion (6), this additional explanation is provided about what constitutes the regulatory floodplain for creditable projects:

Communities may receive credit for retrofitting buildings outside the SFHA with sewer backup protection measures. This credit is available for properties outside the regulatory floodplain only if there are regulations requiring sewer backup protection in new construction. The regulations need to clearly state that any building with a floor below grade level must have overhead sewers or other sewer backup prevention measure.

Note that most building or plumbing codes do not have this requirement. For example, the following language is NOT acceptable because it only applies to situations where the floor drain is below the sewer.

P3007.2 Building drains below sewer (building subdrains). Building drains which cannot be discharged to the sewer by gravity flow shall be discharged into a tightly covered and vented sump from which the contents shall be lifted and discharged into the building gravity drainage system by automatic pumping equipment.

### **533 Credit Calculation**

- On page 530-14, this additional explanation is provided:

Previous Activity 530 credit cannot be carried over for retrofitted buildings or flood control projects.

There is no grandfathering of this credit due to potential changes in flood data. If a new study changes the flood elevations used for determining the flood protection provided (FPP), the values for FPP are recalculated at the next cycle. The value for flood protection before the project (FPB) does not have to change. Credit is provided based on protection from the current known flood hazard, not an historical figure.

This rule does not apply to changes in flood elevations caused by a credited structural flood control project. It does apply to a restudy that reflects changes in watershed or floodplain conditions.



## 540 (Drainage System Maintenance)

### 541.b. Activity Credit Criteria

- On page 540-4, this additional explanation is provided for activity credit criterion (2):

A community can receive some credit for element CDR and/or SBM if one or more components are inspected and maintained by another agency (county roads, state highways, regional flood control or water management district, etc.) and that agency's procedures and the Environmental and Historic Preservation certification has been verified for element CDR and/or SBM credit. The credit may have been verified when another community in the area was verified for CDR and/or SBM or ISO may have worked directly with an agency that wanted to help get CRS credit for the communities in its jurisdiction. Note the following:

- Credit is available for work done by others even if the community does not have a drainage maintenance program or does not submit documentation for its own program.
- The community will still need to produce the inspection and maintenance records for the verification period for the locations in its corporate limits. In other words, the community must at least coordinate with the agency.

- On page 540-5, this additional explanation is provided for credit criterion (5):

All open natural channels within the developed portion of the community must be inspected annually and maintained as appropriate for full credit for element CDR.

- Only the open natural channels, or their replacements, can receive credit. There is no credit for underground systems or streets.
- If a program covers only canals, "designated ditches," "flood maintenance channels," or streams shown on the community's FIRM, then the credit is prorated, typically by length of stream.
- The program must cover all known drainage problem areas. This includes repetitive loss areas where the cause of the repetitive flooding was local drainage.
- If the community does not maintain one or more big rivers, credit may still be available. Debris may have no impact on a large river (e.g., 200 feet wide), especially in flat areas. A shopping cart or even a tree may not be a significant obstruction in those instances.
- Although "all" natural open channels are to be inspected and maintained, the CRS does not require the inclusion of very small drainage features that are not likely to be a problem. The handout "CRS Drainage System Maintenance Credit," for example, uses 40 acres of drainage area as a rough standard.

□ Under **Impact Adjustment for CDR** on page 540-10, this additional explanation is provided:

rCDR cannot be 1.0. if any of the following circumstances applies:

- The community does not have jurisdiction over private property and does not coordinate with the owners.
- The community does not have jurisdiction over state or county facilities and does not coordinate with the state or county.
- The community leaves it up to the water management or drainage district to take care of canals and does not coordinate with the district and provide documentation.
- An easement is required to inspect on private property (and the community does not have easements for some areas).
- Inspections are only done if there's an emergency.

## **610 (Flood Warning and Response)**

### **611.b. Activity Credit Criteria**

- On page 610-3, this additional explanation is provided for criterion (1):

Notwithstanding this requirement, if the community has no critical facilities that can be affected by flooding, five points of credit will be provided for cCFP.