



March 10, 2016

Mr. Tom Powell, Chair
CRS Task Force
303 North Bone Drive
Normal, IL 61761

Re: Comments on the Community Rating System (CRS) and the 2013 CRS Manual

On behalf of the Colorado Association of Stormwater and Floodplain Managers (CASFM), we want to express our appreciation for the commitment shown by the Task Force in developing the Community Rating System (CRS). The CRS provides a framework to communities looking to go above and beyond the minimum flood protection standards of the National Flood Insurance Program. Furthermore, we understand the complexities of preparing and implementing this program across the nation. The CRS is a program with a strong presence in Colorado and professionals within our organization have a significant stake in its continued success.

CASFM has sponsored a CRS Committee since 2008, with many of our committee members being active since its formation. As you may recall, our organization sent a formal letter to the CRS Task Force in 2008 outlining comments on the program at that time. We appreciate the Task Force's willingness to review and in several cases address our concerns as part of updates to the CRS manual.

Since the 2013 major revision to the CRS manual, many of our communities have now cycled through the new manual. Our membership of over 800 professionals in the stormwater and floodplain management fields feel it is important to provide feedback on our experiences with the new manual in the hope the Task Force will consider these comments in future updates.

The attached document includes the comments on the 2013 CRS Manual prepared by the CASFM CRS Committee. The CRS Committee presented the comments to the CASFM Board of Directors at the March 10, 2016 General Membership Meeting. The Board unanimously approved a motion supporting the CRS Committee's comments.

If you have any further questions or comments, please contact Marsha Hilmes-Robinson at the email below.

Sincerely,

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CRS Comments from the Colorado Association of Stormwater and Floodplain Managers

March 10, 2016

Specific Activity Comments

1. Activity 330 - PPI adoption by Governing Board: We understand the desire for the PPI to be a document fully supported by the community, including its governing board. However, the requirement to have the document adopted by the governing board is considered too burdensome for many communities.

In many communities, the Council does not want to be involved in that level of detail and has many more pressing big-picture policy issues to address during their limited meeting time. We strongly recommend that a community be able to have the City Manager or other higher level manager within the organization approve the PPI document and provide a statement regarding their commitment (financial, policy, personnel, etc.).

2. Activity 330 – PPI Committee Make-up: For a multi-jurisdictional plan, the requirement to have each community supply both a government representative and a stakeholder makes the size and the make-up of the committee difficult to manage. Obtaining “average everyday citizen” commitment to multiple meetings has been difficult. In addition, there should be more acknowledgement and recognition that government workers (other local, State, Federal, etc.) are also citizens of a community and can meet the requirements of an outside stakeholder. These citizens bring valuable experience, enthusiasm and expertise as outside stakeholders. More details on the types of stakeholders that are creditable and those that are excluded needs to be given to ensure the committee receives credit.

It is suggested that there be alternative committee makeup/involvement opportunities that still meet the objectives of the PPI Committee. Examples might include: web surveys, presentation at association meetings, presentations at other citizen groups associated with community groups, etc. Communities need more flexibility.

If the limits on outside stakeholders for a multi-jurisdictional PPI committee are too restrictive, it may result in a decrease in these types of committees or greatly restrict the number of communities that can be included. The Task Force should consider this potential unintended consequence.

3. Activity 410 – Floodplain Mapping – This activity is extremely confusing. This activity needs to be simplified and more explanation and examples provided. A separate reference document with specific examples may be required. Many communities do not even attempt this activity because they do not know where to begin.
4. Activity 420 – Open Space Preservation: The CRS does not recognize a community's investment in open space acquisition of lands in adjacent jurisdictions (such as an unincorporated county property upstream of a city) that serve a significant benefit in the reduction of flood losses. Stormwater does not respect jurisdictional boundaries and Open Space upstream of jurisdictional boundary may actually benefit the downstream area more than Open Space within the jurisdiction. The benefits of Open Space, including those in upstream areas outside of a community, can be documented from the September 2013 floods in Colorado. We believe the community that makes a financial investment in Open Space, especially upstream of their community deserves credit for those areas. A credit for this type of investment could be a separate element under 420.

5. Activity 450 – Watershed Management Plan: Clarification is needed on this activity to better understand why plans are not receiving credit. The need for adopted regulatory standards and what those specific standards are needs to be clarified. Examples of credited plans and the corresponding regulations need to be provided.
6. Activity 501 – Repetitive Loss: Data on repetitive loss needs to be provided to communities in a more timely and consistent manner. This information is needed for several CRS activities as well as being useful to answer questions from the public. Several communities have experienced receiving misinformation or lack of information on repetitive loss that have made their cycle visits more difficult. We understand that this information is provided to communities ONLY when there is an upcoming cycle visit. There are annual activities that need this information. Providing this information automatically, annually would be the most helpful.
7. Activity 501 – Repetitive Loss: We understand that there are two different repetitive loss designations: one for the NFIP and another for grant purposes that are based on different information/qualification criteria. This is confusing and needs to be modified either in renaming one of the criteria and/or having only one criterion. This clarification is needed for use in various CRS activities.
8. Activity 510 – Floodplain Management Plan – Further improvements are needed to have the CRS requirements for Floodplain Management Planning more closely align with the Hazard Mitigation Planning process. The requirements and level of detail required for CRS are much more rigorous than those required for a Hazard Mitigation Plan. For a multi-jurisdictional plan where some communities are in the CRS and others are not, this is a very difficult activity to coordinate. Furthermore, many of the consultants who assist communities in preparing these plans have limited experience with the CRS requirements as compared to the Hazard Mitigation Plan requirements. More training needs to be offered to these consultants.
9. 600 series – Flood Warning and Response: Suggest this series be reviewed to determine if there are certain components that could be credited because they offer a “stand-alone” benefit without being required to meet all other elements as currently required. For example, having dam and levee inundation maps compiled should be worth some credit.
10. Activity 630 – Security Issues regarding Dam Inundation Mapping: We see this as a continuing issue with federal agencies, such as the Bureau of Reclamation. Continued discussions are needed if there is a desire to make this information public.

Prerequisite Comments

11. Class 4 rating – Watershed Management Planning credit: Please see comment #5 above regarding WMP credit and the confusion about what is needed. Several communities are finding this to be a hurdle in order to obtain a CRS Class 4.
12. CRS Class 4 rating – Floodplain Management Planning credit: The prerequisite requirements are quite confusing because of the multiple layers of requirements. It is suggested this be reviewed to reduce the multiple requirements for points.
13. If there is an element that is required as a prerequisite, it would seem that has been deemed to be an extremely important component for that level of floodplain management. However, there are cases where the prerequisite is not credited for points without additional elements

(Example Activity 620 and 630 dam and levee inundation mapping). It is suggested that all prerequisite requirements receive credits under their specific activity.

14. BCEGS is a prerequisite that seems to be a challenge for many communities. Communities would like to see if there is an alternative to the BCEGS that would meet the CRS needs and not require a community to go through an additional review process. Other accreditations may meet the intent and satisfy the activity. Consideration should also be given based on a case-by-case basis review.

Process Comments

15. Consider modifying the Quick-Check application to eliminate the point calculation component because this could be confusing for new communities and misleading as to the actual points that would be credited.
16. We strongly request that more feedback/comments be provided to communities on the activities they submit, especially those requiring special review. This is needed to understand how much credit was received and any items that were missing. We recognize this is provided upon request, but feel this documentation should be a standard practice and be integrated into the review cycle. This feedback should also be provided in a timelier manner. Waiting 6-9 months or longer for feedback is too long.
17. Communities should be given the opportunity to review all their credits and have the chance to “appeal” the credit points received. This appeal period should become a more formal step in the cycle verification process.
18. We are concerned about the increasing costs associated with preparing documentation for the CRS. Communities are often conducting a cost-benefit analysis to determine if they will continue participating and to what degree. We have also seen a recent trend in many communities outsourcing the work to consultants. This outsourcing results in less knowledge about the CRS at the local level. An unintended consequence could likely be less support for CRS and a reduction in future improvements in CRS ratings.