

November 4, 2016

Ms. Shea Thomas

Chair

Colorado Association of Stormwater and Floodplain Managers

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Ms. Marsha Hilmes-Robinson

CRS Committee Chair

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Dear Ms. Thomas and Ms. Hilmes-Robinson:

Thank you for your March 23, 2016 letter commenting on the National Flood Insurance Program's (NFIP) Community Rating System (CRS). I shared your letter with the CRS Task Force at our April 2016 meeting. The CRS Task Force appreciates the Colorado Association of Stormwater and Floodplain Manager's dedication to the CRS program and your comments on how the program could be improved. As you know the CRS is a national program and strives to be consistent nationally with our requirements while recognizing regional differences.

Given the timing of your letter and the schedule for the development of the 2017 CRS Coordinator's Manual, we considered your recommendations as best we could for the 2017 Coordinator's Manual. Fortunately, a number of your suggestions were already being discussed for the 2017 Coordinator's Manual. Other suggestions will be considered in the development of the 2020 Coordinator's Manual. Below are our comments on your concerns and recommendations.

Activity 330 (Outreach Projects) – PPI adoption: In the 2017 Coordinator's Manual we have modified the language on adoption to formal approval of the document by a formal vote by either the governing body or by a governing body with authority to implement the program. We feel that formal adoption is important and it will continue to be a credit criteria.

Activity 410 (Floodplain Mapping) – Mapping credit: We understand credit in Activity 410 has a number of complexities. We will continue to explore options to simplify this activity and would appreciate any specific suggestions you might have. Our primary concern is that documentation and calculation of 410 credit be fair to all communities.

Activity 420 (Open Space Preservation) – Open Space credit for land outside of the community: We recognize the importance of open space and can consider the issue of open space purchased by a community outside of that community in our 2020

Coordinator's Manual deliberations.

Activity 450 (Stormwater Management) – Watershed Master Plans: The recommended WMP element is included in the revision of the 2017 Coordinator's Manual.

Section 501 – Repetitive loss information. We agree that timely and accurate information on repetitive loss properties needs to be available to communities. The CRS program is working to improve the delivery of the data. We do recognize that there are multiple definitions of repetitive loss and we will revisit this issue with the 2020 Coordinator's Manual.

Activity 510 (Floodplain Management Planning): The Task Force has formed an Activity 510 committee to address the issues raised by you and others. The committee will address the types of plans being submitted, whether they meet the intent of the program, and make recommendations for improvements for the 2020 Coordinator's Manual. The ten-step Floodplain Management Planning process is very important to the CRS for the development of flood mitigation plans and we are coordinating with FEMA headquarters staff, and periodically have meetings with them to discuss our planning processes.

600 Series (Warning and Response): The requirement for credit in the four primary elements in the 600 Series activities was discussed by a 610 workgroup of the CRS Task Force that included the local representatives on the Task Force. The workgroup recommended keeping the requirement for some credit in all four primary elements. Therefore, there is no change in this requirement at this time.

CRS Class Prerequisites: As discussed above there are modifications proposed to address the Activity 450 issues and a committee has been formed to address the Activity 510 planning issues. Your recommendation of credit for all prerequisites will be discussed during the deliberations for the 2020 Coordinator's Manual.

BCEGS: We understand that for some communities the BCEGS requirements can be difficult to achieve, however FEMA strongly believes in the positive correlation between stronger more resilient communities with good building department programs and higher BCEGS ratings. Note, there is an option on page 110-7 of the Coordinator's Manual for the submission of alternate approaches to the class prerequisites. A community can submit an alternative to BCEGS at any time and ISO staff will review the proposal to see if it is equivalent.

CRS Quick Check. We are implementing this recommendation to remove the points from the document as we agree it is confusing for new communities.

We appreciate the comment on timely review and feedback and will continue to work on improvement in this area. While there is no formal "appeal" process, there should be ample opportunity for a community to work with their ISO/CRS Specialist during the verification process to understand what is scored and how the documents are scored.

We will continue to work on improving our coordination with communities. Many communities have commented on the time and cost of providing the documents required to verify credit. We believe some of that time and cost is associated with some of the documentation standards new in the 2013 Coordinator's Manual and hope that much of the effort is a one-time event. Your time and effort to document the credit is a concern to us as well and we continue to try to find simpler and more efficient methods for communities to use.

Thank you for your continued interest in CRS and the time you took to provide your comments. Please do not hesitate to contact me or Bill Lesser at (202) 646-2807 or at bill.lesser@fema.dhs.gov, if either of us can be of further assistance.

Sincerely,

Tom Powell
Chair, CRS Task Force

Cc: Bill Lesser, FEMA