



ASSOCIATION OF STATE FLOODPLAIN MANAGERS, INC.

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August 14, 2020

Emailed to fema-mitplan-guide-updates@fema.dhs.gov

Emailed from Tim Trautman, Mitigation POD Committee Coordinator on behalf of ASFPM

RE: State and Local Mitigation Plan Guides Updates

To Whom It May Concern:

On behalf of the Association of State Floodplain Managers (ASFPM), we are pleased to submit ideas and comments on updates to the State and Local Mitigation Plan Guides. Hazard mitigation plans can serve as the backbone of decisions and actions that can reduce flood damage. Below we offer recommendations on updating mitigation plan guides to help improve mitigation plans.

ASFPM has over 18,000 members nationwide and 36 chapters. In order to protect life and property and reduce the unsustainable expense of flood disasters to the federal taxpayer, we must promote efficient and effective mitigation planning. Generally, ASFPM supports updating the State and Local Mitigation Plan Guides to support the National Mitigation Investment Strategy (NMIS). We think most of these ideas support the NMIS principles. Please consider the following:

- 1) Simplify the planning process. The guides must have planning tools and options for smaller or less sophisticated communities. An effective plan in some locations may be short and concise. FEMA should continue to work on automation, tools, templates, and simple versions of the plans that are comprehensive yet easy to create when appropriate.
- 2) Merge useful parts of the “crosswalk” with parts of the current tool. The crosswalk was useful for clarifying the requirements of each element and forced communication with the community. The current tool is useful for providing positive feedback and looks forward to future plan revisions. A combination of the two approaches would be helpful: keeping the first part of the former crosswalk, while adding the second part of the current tool.

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- 3) Improve access to insurance and repetitive loss data. It is difficult to secure NFIP data broken down by community: number and type of policies, total value, premiums, RL/SRL data, etc. The ability to secure this information varies tremendously from state to state. Although Privacy Act issues that have cut off access to much of this data may be beyond FEMA's complete control, creative solutions are needed to provide this data for proper planning.
- 4) Add larger focus on natural infrastructure. The National Mitigation Investment Strategy states: *"The whole community should consider nature-based solutions, such as green infrastructure, for cost-effectively managing the impacts of natural hazards. These solutions may provide additional environmental, social, and economic benefits. The whole community should also consider protecting natural assets that help with mitigation (for example, wetlands that reduce the impact of waves on coastal land)."* The current State and Local Mitigation Plan Guides make no mention of nature-based solutions, or any similar terminology. It seems logical to assume that unless the guides specifically reference nature-based solutions, states and local communities will continue leaving out these planning elements and the actions that would build capacity for design and implementation of nature-based solutions.
- 5) Strengthen recommendations for integration with state and local natural resources agencies and plans. The National Mitigation Investment Strategy encourages states to take an integrated approach to natural hazards mitigation by encouraging *"collaboration and commitment by the Federal Government, non-federal partners, and individuals"* and *"The whole community should consider regional and community planning for mitigation activities. This includes public and private planning efforts for land use, the environment, infrastructure, transportation, site planning, and urban design."*

States have a multitude of plans for climate adaptation and resilience, from habitat restoration to water quality improvement and more. It is critical to ensure that the individuals working to implement these assorted plans are working collaboratively, and the development of a State Hazard Mitigation Plan is the perfect time to foster this coordination. The update cycle is predictable and dependable. FEMA should update state mitigation plan guidance to foster additional integration between hazard mitigation and natural resource management.

- 6) Address Future Conditions. We recommend that FEMA retain and strengthen the discussion of future conditions. The Hazard Identification and Risk Assessment section should include guidance on the types of changes in land use and the built environment that should be considered. This section could generally assess changes with each watershed that may

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affect runoff (land use, climate changes, etc.) These all play a significant role in the intensity of natural hazards and the potential damage they can cause.

- 7) ASFPM supports planning that looks at any inherent bias that may result in higher risk to communities of color and low income. The State and local mitigation plan guides do not address how states and local communities could evaluate if marginalized populations have been negatively impacted by any historical injustices. This should be part of the planning process to ensure that everyone has equal access to mitigation resources if vulnerable or underserved populations are at greater risk.