



ASSOCIATION OF STATE FLOODPLAIN MANAGERS, INC.

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March 18, 2008

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John Ingargiola
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500 C Street, SW., Room 609
Washington, DC 20472

Subject: Proposed changes to TB 1-93. Openings in Foundation Walls and Walls of Enclosures Below Elevated Buildings in Special Flood Hazard Areas in accordance with the National Flood Insurance Program

The Association of State Floodplain Managers is a national, non-profit, professional membership organization whose 11,000+ members are floodplain managers from all across the U.S. and beyond. The national association and our 26 State Chapters are composed of the professionals who do the job "on the ground" to make flood loss reduction a reality at the state and local levels. The ASFPM Floodplain Regulations Committee has solicited input from its members regarding the above referenced request for comments. We wish to thank you for the opportunity to assist in enhancing the quality, utility, and clarity of the information collected by use of the forms that are the subject of the request.

The comments from the Floodplain Regulations Committee are as follows:

COMMENTS

General comments

1. The length of the proposed Technical Bulletin detracts from its primary use which is to provide guidance on the NFIP Regulations concerning the requirement for openings in below-Base Flood Elevation foundation walls for buildings located in Zones A, AE, A1-A30, AR, AO, and AH. At 35 pages the document is longer than necessary and contains too much ancillary information. Examples of information which could be consolidated, eliminated, or relegated to

Dedicated to reducing flood losses in the nation.

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a list of references, includes information regarding specific building codes, background of the NFIP and NFIP Regulations which appears at both the beginning and end of the document, and the photographs and diagrams. We feel strongly that concise, simple statements which clarify the regulations are needed, rather than addressing a range of atypical situations, such as flood openings in V-Zones or flood openings which extend above Base Flood Elevation.

2. The proposed changes to TB 1-93 will be more effective if they are accompanied by revisions to the instructions in the FEMA Elevation Certificate form. The Elevation Certificate is the most commonly used form to document the compliance of flood openings with NFIP and local floodplain regulations, and for insurance rating. The instructions and sections A-8 and A-9 of the EC should include provisions to recognize and address engineered enclosure designs.
3. Page 3 – The reference to flood openings in breakaway enclosures in V-Zones should be eliminated. It is not a regulatory requirement, serves no significant flood mitigation purpose, and is generally done by mistake. This practice should not be memorialized in the technical bulletin, and any insurance rating provisions which lead to the placement of flood openings in V-Zone should be addressed separately.
4. Page 7 – The underlined text at the bottom of the page should be corrected to reflect the fact that flood insurance will be LESS expensive if inside grade is not below outside grade.
5. Page 7 – a definition of “shallow floodplain” or reference to one would be helpful. This is not a commonly known term.
6. Page 11 – States that openings in coastal A-Zones will allow for equalization of hydrostatic loads during flood events less than the base flood. Don't the requirements of 60.3 – equalization of flood forces to the base flood elevation – also apply in these areas?
7. Page 13 – It might be a good idea to modify or delete the first sentence of the paragraph regarding accessory structures. Floodways and v-zones are both significant exceptions to this sentence. Additionally many communities interpret the regulations as placing size and use restrictions on non-elevated detached buildings.
8. Page 14 – The statement that portions of flood openings above BFE should not be counted towards the compliance flood openings requirements should be revised or eliminated. As written, this statement impacts the common practice of placing flood openings in the second exposed layer of foundation blocks in a crawl space where BFE is foot or so above grade. It would require that only a portion of such flood openings be counted towards compliance.
9. Pages 13, 14, and 22 contain citations of building codes such as the IBC, IRC, and National Fire Protection Association. Depending on whether communities have adopted these codes, or certain sections of these codes, the flood openings provisions may not be applicable. The purpose of this Technical Bulletin is to provide guidance on the NFIP regulations. A sentence or two stating that local codes may contain more restrictive provisions than the NFIP Regulations, and the listing of these codes in the Further Information section is preferable to describing the codes in the TB.



10. Page 15 - The “Finished exterior grade” section may need to be modified. Both Lowest Adjacent Grade and Highest Adjacent Grade are defined by FEMA as natural grades. Therefore landscaping fill may often not be considered “grade” and so would not necessarily result in “below grade” crawl spaces.
11. Page 16 – The statement that if interior grade is higher than the exterior grade, the openings are to be within one-foot of the interior grade is incorrect. The NFIP regulations require the bottom of flood openings to be within one foot of “grade” which is defined as exterior (the inside of a crawl space is the bottom floor). The Elevation Certificate, and FEMA state that grade means exterior.
12. Page 26 – “Engineered openings” is a term that does appear in the NFIP regulations, and is misleading. Section 60.3 (c) (5) of the NFIP requires enclosure designs to be certified by an engineer or architect, as an alternative to the prescriptive design. It is the enclosure that is required by the regulations to be certified, not the opening products. Pages 26-28 should be renamed Engineered *Enclosures* and rewritten accordingly

Please contact Michael Powell at (302) 739-9921 or michael.powell@state.de.us if there are any questions regarding these comments.

Thank you,

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Jonathan Sorg, CFM

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