**Five-Year CAP-SSSE Work Plan**
**August 11, 2004**

**Purpose:** This Five-Year CAP-SSSE Work Plan serves as Illinois' commitment to actively participate in the Federal Emergency Management Agency's (FEMA) National Flood Insurance Program. This plan provides a guideline to ensure that state government and the participating communities are maximizing efforts to achieve the flood loss reduction goals of the National Flood Insurance Program. This plan meets the FEMA requirement for a State Business Plan which is included in the CAP-SSSE narrative for FY-2004.

**State Authority:** The Department of Natural Resources, Office of Water Resources has authority to implement floodplain management under the Illinois Complied Statutes Chapter 615, Waterways, Act 5. Rivers, Lakes, and Streams Act. Illinois has regulated construction in state waters since 1914. Formal regulations have been in effect since 1975. The state's regulatory program exceeds the minimum floodway criteria set forth by FEMA. In 1979 the Governor signed an executive order (4-79) requiring the review of all projects located in the floodplain which would involve direct or indirect state funding.

**State Vision for the CAP-SSSE Program:** The State will continue to make every effort to provide its citizens with timely accurate flood plain management information. The State will provide the necessary leadership, educational and technical assistance to communities to support successful implementation of the National Flood Insurance Program (NFIP). The State will work in partnership with the Federal Emergency Management Agency (FEMA) in providing technical assistance, training and oversight to promote community floodplain management efforts in compliance with National Flood Insurance Program (NFIP) criteria.

**Current Efforts:** The State' current efforts are focused in ten areas as identified by FY04 CAP-SSSE activities. They are as follows:

1. Conduct community assistance visits (CAVs).
2. Review ordinances.
3. Conduct workshops.
4. Provide general technical assistance to public, private, local, state and federal interests.
5. Review Submit-for Rate forms.
6. Coordinate with other state and federal agencies.
7. Respond to disasters.
8. Support CRS
9. Identify and Mitigate floodprone structures
10. Support professional associations related to flood plain management activities (IAFSM, ASFPM, ect.).

In addition, the State has recently completed the Illinois Flood Map Modernization State Business Plan. This plan lays the ground work for achieving the goal of providing the citizens

with timely accurate flood mapping information.

**Strengths:** Illinois currently has 797 communities participating in the National Flood Insurance Program, 761 in the Regular Program and 36 in the Emergency Program There are 45,437 policy holders in the state. Illinois has two professional floodplain managers assisting citizens and communities through the CAP-SSSE program. Thirteen engineers in the Resources Management Division support the efforts through the state floodway permit program and provide technical assistance to the CAP-SSSE program staff, local communities, other state agencies and FEMA. The remaining 65 members of the Office of Water Resources staff support the state's goal of flood damage reduction. The State has consistently demonstrated that it is an effective, technically competent and active member of the CAP-SSSE team. The State has developed and maintained a strong working relationship with FEMA Region V staff personnel, local communities, engineering firms, insurance agencies, lending institutions, the Illinois Association for Floodplain and Stormwater Management (IAFSM) and the national Association of State Floodplain Managers.

Additionally, the state has developed a flood mitigation program which purchases repetitive loss structures, as well as potential repetitive loss structures. The major role of this program is to provide the local match for federal disaster mitigation projects. The state program is not tied to federal disaster declarations. It has and will continue to purchase available flood prone properties to the extent funding is available.

The state has had a program of flood loss reduction since the 1940's. For decades unwise floodplain development occurred faster than flood mitigation measures could address the existing problems. Until about 1990 the state experienced ever increasing flood damage. The efforts of state, local and federal agencies to reduce flood damages is finally showing results. Flooding on the Mississippi River and the Des Plaines River in the last 10 years resulted in lower damages than had occurred for the preceding smaller frequency occurrence. Since neither of these areas is the beneficiary of a structural flood control project, it follows that the lower damage levels are the result of the removal of flood prone properties through regulatory and mitigation efforts. While the number of properties removed or protected through mitigation programs is significant, it is clear that the development of strong floodplain management programs at the local and state levels has resulted in virtually all recent development being protected from flood damage.

**Weaknesses:** The States current weakness is its budgetary constraints. This results in the inability of the department to provide additional matching funds to staff the CAP-SSSE efforts. As a result, the 2 floodplain managers that directly support CAP-

SSSE activities are constrained in their effectiveness. The need to perform ever increasing duties on a day to day basis prevents initiation of long term projects which would increase the abilities of the statewide floodplain management community. The existing staff are also frequently called on to assist in non-CAP-SSSE funded activities when expertise in flood insurance, risk identification, or local regulatory programs are needed, further limiting time available to big picture initiatives. The inability of the state to provide additional full time staff also limits the ability to train junior staff to ensure a continuous level of service in the future.

IDNR has recommended a strengthened executive order be issued. The recommendation has not been implemented. Efforts to replace the existing order are ongoing.

Illinois has more stream miles, more identified floodplain areas, more NFIP participating communities, more flood insurance coverage, more flood insurance claims, more repetitive loss properties, and more required technical assistance than any other state in the midwest. There are several areas of the state which were highly urbanized before the concepts of floodplain management were developed. Thus the state will continue to experience significant flood damage. The ongoing effort to minimize flood losses will continue to challenge existing staff.

The state's executive order related to review of flood plain construction activities receiving direct or indirect state funding needs to be updated.

**State Strategy to Improve CAP-SSSE Activities**

Listed below are the services that the State will engage in to improve floodplain management:

Provide ordinance assistance and adoption guidance in a timely manner.

Pursue increased participation in the Community Rating System program.

Provide communities general technical assistance.

Conduct Community Assistance Visits and continue to insure that local communities are adhering to their commitment under the National Flood Insurance Program.

Develop workshops in order to improve the level of National Insurance Flood Insurance expertise at the local level. Participate in workshops developed by other entities, such as IASFM and ASFPM, when those workshops increase the effectiveness of the CAP-SSSE effort.

Work closely with FEMA and State staffs on developing projects that address mitigation of floodprone structures.

Encourage increases in the professional competency of local communities' staff. Recommend participation in the Certified Floodplain Managers (CFM's) program and attendance at the Illinois Association for Floodplain and Stormwater Management's (IAFSM's) annual conference. Develop and recommend additional professional development opportunities for local flood plain management staff.

Continue to provide direct assistance to local officials during and immediately after flood events to maintain compliance with the NFIP program requirements.

Continue to pursue replacement of the existing executive order and increase state resources allocated to the CAP-SSSE activities.

**Program Milestones for Fiscal Years 2005-2009**

| | FY 05 | FY 06 | FY07 | FY08 | FY09 |
|---|---|---|---|---|---|
| New Communities enrolled in the Community Rating System Program | 5 | 10 | 15 | 20 | 20 |
| Community Assistance visits | 55 | 60 | 70 | 75 | 75 |
| Workshops developed | 2 | 3 | 3 | 4 | 4 |
| Assist communities with ordinance adoption | 40 | 80 | 140 | 140 | 140 |
| Ordinances reviewed | 60 | 120 | 220 | 220 | 240 |
| Provide quarterly report of map adoption | 4 | 4 | 4 | 4 | 4 |
| Participation in workshops/seminars by others | 3 | 3 | 4 | 4 | 4 |
| Counties added to floodprone structures database | 4 | 5 | 5 | 5 | 5 |
| General Technical* Assistance Activities | 2000 | 2000 | 1900 | 1900 | 1800 |

| | | | | | |
|---|---|---|---|---|---|
| Maintain Five-Year Floodplain Management Plan | Compare results vs actual | Compare results vs actual | Compare results vs actual | Compare results vs actual | Compare results vs actual |

*This activity list assumes that the increasing level of local staff capability results in a decreasing need for general technical assistance

**Coordination with State Agencies:** A strong, cohesive and cooperative working relationship exists between the IDNR and the State agencies identified below:

Illinois Emergency Management Agency (IEMA)

Illinois State Water Survey (SWS)

Illinois Department of Insurance

IDNR coordinates on an ongoing basis with other agencies, for examples the Illinois Departments of Transportation, Agriculture, Historic Preservation, Environmental Protection, and the Illinois Capital Development Board under the State permitting procedures. IDNR coordinates with local libraries and school districts through the permitting process and Illinois Executive Order 4-79.

## Other Activities which Support Local Compliance

IDNR offers floodway permit review assistance to local communities through its permit review staff. Typically this is done through the local floodplain ordinance. The Model Ordinance allows communities to accept an IDNR floodway permit as proof that the proposed construction meets a standard which exceeds the NFIP minimum standard. This allows communities to avoid the expense of hiring additional technical staff or hiring outside consulting services for review of complex permit applications.

The State of Illinois floodway permitting program also assists local officials to ensure compliance with NFIP regulations. State floodway permitting engineers are well trained in NFIP and local regulations. Floodway permit applications are routinely reviewed for compliance with local regulations. The state coordinates closely with floodway permit applicants and local officials to notify them of potential conflicts with local permitting requirements.

## Change in Activity Mix

Activities may be adjusted based on the following:

Flood Emergency Requirements.

A change in the funding assumptions for the MMMS and Map Modernization efforts.

Requests from local communities or other organizations to conduct additional workshops.

Requests from federal, state or local agencies to make presentations on NFIP topics.

**Needs Analysis and Gap Assessments**

The major gap will exist in the area of funding for staff to supporting the activities listed in the Plan. Activity levels shown above assume a gradual return to normal budget conditions, making one additional state funded staff available for application to the CAP-SSSE efforts.

The activity levels are consistent with current CAP-SSSE staffing except the level of ordinance reviews (see section below). To complete the projected level of ordinance reviews one additional staff in year 2 and 2 additional staff in year 3 will be required.

**Map Modernization Activities**

Map Modernization State Business Plans have been considered in the development of the activities section. Scoping meetings, preliminary map review, and outreach activities are funded through the CTP Mapping Activity Statements. Adoption of new or revised local ordinances will be supported by CAP-SSSE staff. The remapping activity will result in revision of 700+ ordinances in the 5 year period.

**Evaluation**

The CAP-SSSE activity has been given an evaluation metric by the Governor's Office. The metric measured is the percentage of communities in compliance with the requirements of the Federal Flood Insurance Program. The target measure is 95% compliance, measured on a continuing basis. IDNR reports the compliance level on a quarterly basis. The last report showed a 95.5% compliance level.

IDNR reports the level of completion of the activities listed in the CAP-SSSE grant narrative. This review allows IDNR and FEMA to adjust grant funded activities to meet changing needs. The most common adjustment provides funding under the grant for CAP-SSSE funded staff to respond to disaster occurrences, which cannot be predicted.

IDNR will also monitor all map adoption activities in the state. CAP-SSSE staff will track all adoption activities to ensure that adoption occurs prior to the effective date of the revised maps. A report of the adoption activities will be included in the CAP-SSSE quarterly activity narrative.