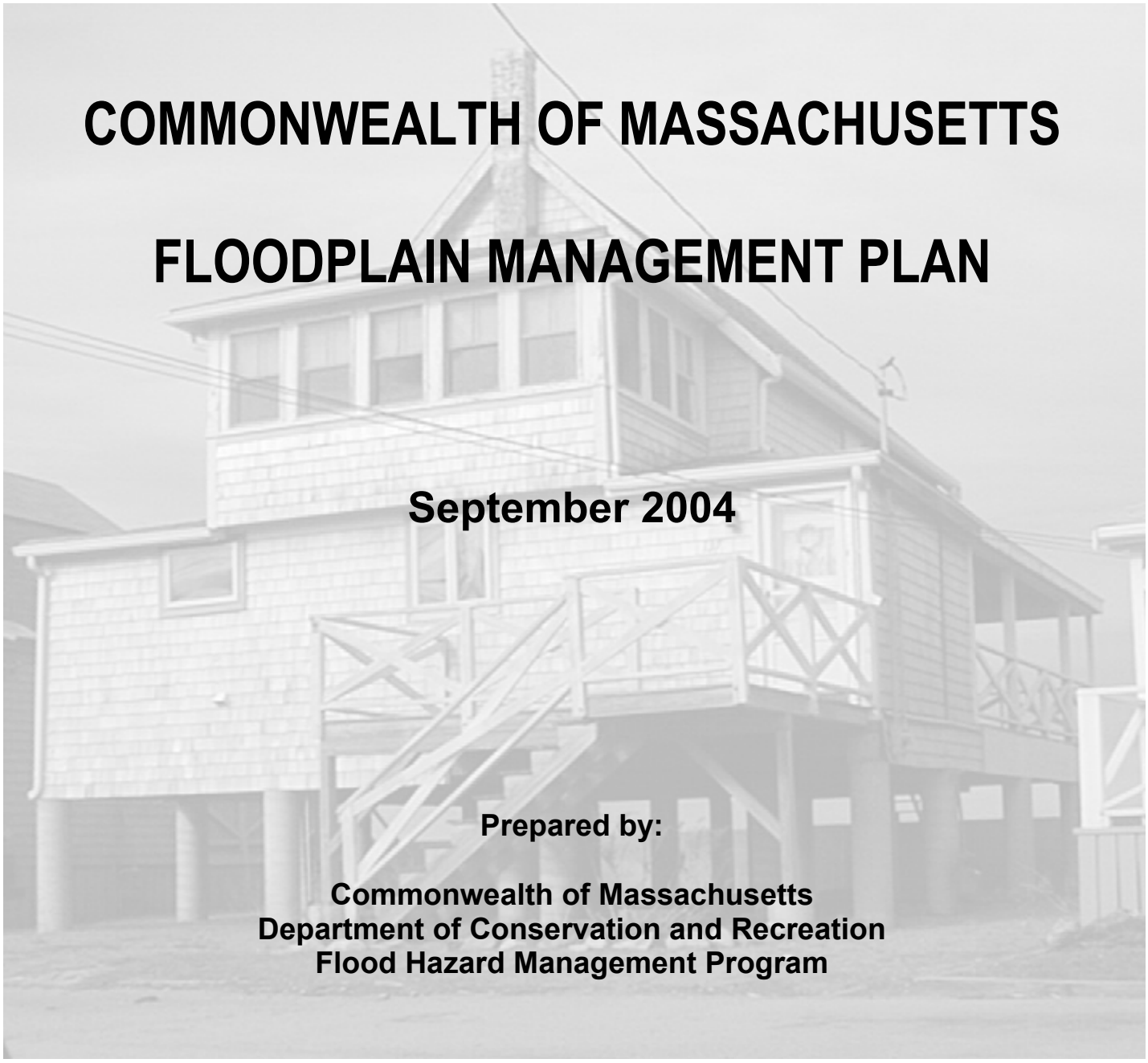


COMMONWEALTH OF MASSACHUSETTS

FLOODPLAIN MANAGEMENT PLAN

September 2004

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COMMONWEALTH OF MASSACHUSETTS
DRAFT FLOODPLAIN MANAGEMENT WORK PLAN

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COMMONWEALTH OF MASSACHUSETTS
DRAFT FLOODPLAIN MANAGEMENT WORK PLAN

I. State Authority

A. NFIP State Coordinating Agency

The Flood Hazard Management Program (FHMP) within the Massachusetts Department of Conservation and Recreation (DCR) is the state coordinating agency for the NFIP. The initial establishment of a state NFIP coordinating agency occurred with the signing of Massachusetts Executive Order 149 by Governor Dukakis in 1978. This Executive Order designated the Massachusetts Water Resources Commission (WRC) as the state coordinating office for the NFIP.

Under Chapter 21 of the Massachusetts General Laws (MGL), the Department of Environmental Management's Division of Water Resources (DWR) serves as support staff for the WRC. In 1980, the Flood Hazard Management Program was created within the DWR to be the NFIP state coordinating office. In 2003, Chapter 21 of the MGL was amended to combine the Department of Environmental Management and the Metropolitan District Commission to form a new Department of Conservation and Recreation (DCR). The Division of Water Resources, which had previously been renamed the Office of Water Resources, was moved into a new Division of Water Supply Protection within the new department.

The FHMP has been funded by the Community Assistance Program-State Support Services Element (CAP-SSSE) under a 75% / 25% cost sharing arrangement to carry out a full range of assistance activities under the NFIP. These include but are not limited to Community Assistance Visits and Contacts; ordinance reviews; and outreach, training, and technical assistance activities related to the NFIP and floodplain management in general. In recent years, the scope of activities under CAP-SSSE has been expanded to include technical support for flood mitigation grant programs such as the Hazard Mitigation Grant Program (HMGP), the Flood Mitigation Assistance (FMA) program, and the Pre-Disaster Mitigation (PDM) grant program, as well as support for FEMA map revision efforts through participation in scoping meetings and community coordination meetings.

B. Other Agencies Implementing Floodplain Management

1. Overview

While the DCR FHMP is the NFIP state coordinating agency and thus the lead floodplain management agency in the Commonwealth, a number of other agencies play a key role in implementing floodplain management in Massachusetts. In fact, most of the construction requirements of the NFIP are not enforced by local ordinance, but rather by state regulations administered by agencies other than the DCR FHMP.

2. Board of Building Regulations and Standards (BBRS)

The Massachusetts State Building Code (780 CMR) contains most of the NFIP construction requirements related to buildings or structures. These requirements are found in Section 3107, "Flood-Resistant Construction." The code is promulgated by the Board of Building Regulations and Standards (BBRS). The code is enforced at the community level by board-certified building inspectors. The BBRS holds hearings and decides on appeals to decisions issued by local building inspectors.

3. Department of Environmental Protection (DEP)

The Department of Environmental Protection (DEP) administers three regulatory programs related to floodplain management. The state wetlands regulations (310 CMR 10.00) define both coastal and riverine floodplains as wetland resources that are protected under the Wetlands Protection Act (M.G.L. c. 131, § 40). Performance standards are established in the regulations for all activities to be carried out within protected resource areas. The regulations are enforced at the community level by local Conservation Commissions, with oversight and appeal authority provided by DEP.

The state waterways regulations (310 CMR 9.00) establish standards for permitting any project proposed in, under, or over flowed or filled tidelands or great ponds, under the Public Waterfront Act (M.G.L. c. 91). Projects are reviewed and Chapter 91 Waterways Permits are issued by the DEP Division of Wetlands and Waterways.

Title V of the State Environmental Code (M.G.L. c. 21A, § 13) establishes standards for the regulation of septic systems in 314 CMR 5.00. Specific standards are established for the location of septic systems within floodplain areas, and strict standards are set within coastal high-hazard areas (V zones). Septic systems generating less than 10,000 gallons per day are regulated by local Boards of Health with oversight by DEP. Larger systems must be reviewed and approved directly by the DEP.

4. Office of Coastal Zone Management (CZM)

The Massachusetts Office of Coastal Zone Management (CZM) is the lead policy and technical assistance agency responsible for implementation of Massachusetts coastal policies through the Massachusetts Coastal Zone Management Plan. The state's coastal program is a "networked" rather than regulatory program, utilizing existing regulations such as the aforementioned wetlands regulations and waterways regulations for enforcement of the state's coastal policies. In addition, CZM is charged under Executive Order 181 (Barrier Beaches) with coordinating barrier beach management in the Commonwealth. CZM also conducts federal consistency reviews under the Coastal Zone Management Act (16 U.S.C. 1451 et seq.) to insure that federal actions potentially affecting the coastal zone are consistent with state coastal policies. Consistency reviews are conducted for any project undertaken by a federal agency, requiring a federal permit, requiring a federal offshore oil and gas lease, or receiving

federal funding, that is in or may affect the land or water resources or uses of the Massachusetts coastal zone.

5. Massachusetts Emergency Management Agency (MEMA)

The Massachusetts Emergency Management Agency (MEMA) is the lead emergency management and disaster assistance agency in the Commonwealth. MEMA, in addition to its lead role in the preparedness, response, and recovery phases of emergency management, jointly administers with DCR all of the Commonwealth's mitigation programs. This includes the Hazard Mitigation Grant Program (HMGP), the Flood Mitigation Assistance (FMA) program, and the Pre-Disaster Mitigation (PDM) program.

6. Other State Agencies and Programs

The Commonwealth of Massachusetts has many other environmental statutes, regulations, and programs that are related to floodplain management in varying degrees. The Massachusetts Office of Coastal Zone Management has developed a guide to these programs, entitled "Environmental Permitting in Massachusetts." This guide provides a description of each program, including the underlying statutes and the associated regulations. A copy of this guide can be found at http://www.mass.gov/czm/envpermittoc.htm.

II. State Vision for Floodplain Management

A. State Floodplain Management Goals, Objectives, and Strategies

As is evident from the description above, floodplain management in Massachusetts is carried out by a wide range of state and local agencies and programs. For many of these entities, floodplain management is but one of a series of duties and responsibilities. In order for floodplain management to be effective, there must be constant communication and coordination between all parties involved. Education and technical assistance must be provided to individuals who do not necessarily work on flood related issues on a daily basis. While local floodplain management ordinances are an important component, it is more important that state requirements such as the State Building Code and Wetlands Regulations are enforced in an effective, consistent, and fair manner throughout the Commonwealth.

The FHMP, as the state NFIP coordinating agency, plays a vital role in ensuring that floodplain management is carried out effectively throughout the Commonwealth. This plan will focus explicitly on the goals, activities, measures, etc., of the FHMP, funded through CAP-SSSE, and how the FHMP supports floodplain management in Massachusetts. An examination of all floodplain management activities in Massachusetts, while a worthwhile product, is beyond the scope of this plan.

Floodplain Management Goal

The goal of the FHMP in supporting floodplain management in Massachusetts is:

> Ensure that development in the Commonwealth is constructed consistent with the NFIP requirements and sound floodplain management practices.

Floodplain Management Objectives

The objectives of the FHMP in supporting its floodplain management goal are:

1. Assist flood-prone communities in obtaining and maintaining participation in the NFIP.
2. Support FEMA in ensuring that NFIP participating communities are upholding their requirements under the NFIP.
3. Assist property owners in making wise decisions related to flood insurance purchase and coverage.
4. Encourage mitigation activities that will reduce the risk of flood damage to existing property.

Floodplain Management Strategies

The strategies to be employed by the FHMP to achieve its floodplain management objectives are:

1. Facilitate coordination between Federal, state, and local governments related to floodplain management.
2. Provide education and technical assistance to communities, Federal and state agencies, and individuals related to the NFIP and floodplain management.
3. Support mitigation grant programs and other local mitigation activities and initiatives.

B. Current and Recent Floodplain Management Efforts

Each fiscal year, the FHMP and FEMA Region I negotiate a scope and budget for the year's CAP-SSSE program, in accordance with annual program guidance. Program activities vary from year to year to reflect changes in program goals and/or local state or community needs. For example, in fiscal years 1999 and 2000, significant effort was expended to assist communities in updating and correcting the data in FEMA's repetitive loss database. Effort expended on direct compliance activities such as Community Assistance Visits and Contacts was reduced accordingly.

For the current fiscal year (FY 2004), the CAP-SSSE agreement contains the following activities:

- Develop floodplain management plan
- 24 Community Assistance Visits (CAVs)
- 24 Community Assistance Contacts (CACs)
- Ordinance assistance to 18 communities
- 10 outreach activities (workshops / presentations)
- Work with BBRS to update building code to be based on International Building Code
- Map modernization assistance (scoping and coordination meetings, etc.)
- Recertification assistance to CRS communities
- New England Floodplain and Stormwater Managers Association (NEFSMA) workshops
- Technical support to HMGP, FMA, and PDM programs
- Mitigation planning assistance to communities through 7 regional planning agencies
- General technical assistance to communities, agencies, and individuals
- Attendance at ASFPM conference and regional mitigation meetings / workshops
- Attendance at EMI training for new staff member

FEMA has provided CAP-SSSE funding in the amount of $168,000, and DCR has provided a match in the amount of $56,000, to support these activities. The combined federal and state funding supports approximately 2.8 FTEs: a Program Manager (0.8 FTE), an engineer, and a planner. [The remaining 0.2 FTE of the Program Manager is currently supported by administrative funds of the HMGP program.]

Over the past 8 years, CAP-SSSE activities have varied as shown below:

Fiscal year	1997	1998	1999	2000	2001	2002	2003	2004
Federal funding	$154,000	$154,000	$154,000	$154,000	$154,000	$178,500	$168,000	$168,000
State funding	$51,333	$51,333	$51,333	$51,333	$51,333	$59,500	$56,000	$56,000
Floodplain mgmt. plan								X
CAVs	46	46	18	20	36	28	30	24
Rep loss CAVs			19	12				
Follow-up visits	10	2	2	2				
CACs	40	40		18	30	27	27	24
Rep loss CACs			30	24				
Rep loss letters			88	45				
Rep loss update rpt.					X			
Ordinance assistance	15	15	13	10	10	25	20	18
Model bylaw update	X							
Outreach	9	10	14	9	12	15	12	10
CRS assistance	X	X	X	X	X	X	X	X
Map mod assistance						Map plan	X	X
Mit. plng.-watersheds				3	4	6	4	
Mit. plng.-RPAs						4	4	7
Bldg. code update						X	X	X
NEFSMA workshops			X	X	X	X	X	X
Support HMGP				X	X	X	X	X
Support FMA				X	X	X	X	X
Support PDM								X
Support Proj. Impact				X	X	X		
Conf./reg. mtg. attend	X	X	X	X	X	X	X	X
Staff training	X	X	X	X	X	X	X	X
GTA	X	X	X	X	X	X	X	X

As the breadth of program responsibilities has increased over the years, to support a broad range of mitigation, mapping, and other related initiatives, the level of effort expended on basic NFIP compliance activities such as CAVs and CACs has declined dramatically. Nearly constant program funding (a total increase of less than 10% over the last 8 years) for CAP-SSSE activities in Massachusetts has also reduced program capability from 3.0 FTE in FY 1997 to 2.8 FTE today.

C. Strengths and Weaknesses of Program

The strengths of the FHMP and of floodplain management in Massachusetts are:

1. Staff that is experienced and knowledgeable in the NFIP and floodplain management.
2. Strong working relationship with the FEMA regional office.
3. Well-established working relationships with other state and federal agencies involved in floodplain management.
4. Strong existing state and local regulations (e.g., State Building Code, Wetlands Regulations) that discourage unwise floodplain development.

The weaknesses of the FHMP and of floodplain management in Massachusetts are:

1. Limited size of staff (2.8 FTE) compared to number of NFIP participating communities (332) makes it difficult to maintain close working relationships at community level.
2. Part-time nature and frequent turnover of community officials makes it difficult to develop and maintain floodplain management expertise at local level.
3. Distributed authority makes it difficult to determine responsible parties when inappropriate development occurs.
4. Increasing breadth of program activities to include mitigation planning and project support and support of map modernization has resulted in reduced focus on NFIP compliance through CAVs and CACs.

III. Strategy to Improve Floodplain Management

A. Proposed CAP-SSSE Activities

It is expected that over the next 5 years, roughly the same CAP-SSSE activities will continue to be performed, although the specific nature of those activities and level of effort apportioned to each activity is likely to change over time. The following CAP-SSSE activities are expected to be conducted over the next 5 years:

- Floodplain Management Work Plan. The 5-year floodplain management work plan will be updated and revised as appropriate and necessary. Over the next 5 years, the level of effort for this activity should decrease as the plan becomes more fully developed and plan updates become simpler

- Community Assistance Visits (CAVs). CAVs remain the most effective means to evaluate community compliance under the NFIP. CAVs will be conducted regularly in communities with the greatest need as indicated by policy counts, number of submit-to-rate structures, or other measures. CAVs will also be conducted in communities that request assistance or that have been determined to need assistance through CACs or other contacts. CAV reports will be entered directly into CIS.

- Community Assistance Contacts (CACs). CACs are extremely useful as a means to maintain contact with mid- to low-priority communities. CACs are also an effective screening tool to identify communities in which CAVs should be conducted. CAC reports will be entered directly into CIS.

- Ordinance Assistance. Ordinance reviews will be conducted routinely as part of CAVs and CACs. Ordinance reviews will also be conducted for any community requesting assistance. Assistance will also be provided to communities required to adopt an amended ordinance as a result of map revisions. See Section IV for more details.

- Workshops and Other Training (Outreach). Workshops and other presentations for local officials, other state agencies, engineers and surveyors, and other individuals will be conducted. The specific nature of the training will depend on identified needs at that particular time. For example, training over the next few years will emphasize the importance of establishing a proper elevation datum in project reviews and elevation certificates. This will be critical as revised FIRMs issued through map modernization change from an elevation datum of NGVD29 to NAVD88.

- Model Ordinance. The state model ordinance will be revised and updated as needed. The next major update will likely occur when the 7th Edition of the State Building Code is issued. This edition, which will be based on the International Building Code, will likely change the requirements in our model ordinance. The model ordinance will also be revised to incorporate appropriate language for communities to adopt only the relevant portions of countywide maps.

- Mapping Assistance. The level of mapping assistance is likely to change as a result of map modernization activities. See Section IV for more details.

- General Technical Assistance. Technical assistance will be provided to communities, state and federal agencies, and individuals. Technical assistance will include project review and comment under various permitting and review processes, such as waterways and wetlands permitting, consistency reviews, etc.

- Coordination with Other State Programs. As outlined in Sections I and II, coordination with other state programs is a critical part of the entire CAP-SSSE effort, rather than a separate activity. It is most directly incorporated into the Outreach and General Technical Assistance activities, but is indirectly related to all activities.

- Post-Disaster Assistance. Assistance will be provided to communities following a disaster declaration on an as-needed basis. Necessary changes to the year's scope of work will be negotiated with the regional office based on the needs of the particular disaster. Potential needs could include increased workshops and training related to reconstruction and substantial damage issues, CAVs with particularly hard-hit communities, as well as increased support to the various mitigation grant programs, especially the HMGP.

- Other Activities. Additional activities conducted annually include support for the HMGP, FMA, and PDM programs; mitigation planning assistance to regional planning agencies; participation in national and regional conferences and meetings; and training of FHMP staff as needed. New activities may be negotiated with the regional office as appropriate based on new needs identified by FEMA. A recent example was the provision of widespread assistance to communities in updating and correcting the information in FEMA's repetitive loss database. If necessary, similar activities may be initiated to provide data for the new Repetitive Loss Mitigation Data Tool.

B. Partnership and Coordination with Other Programs

As noted above and in previous sections, coordination with other state programs is an integral part of all CAP-SSSE activities. Project and permit reviews are closely coordinated with DEP and CZM to ensure that the approved projects are compliant with NFIP regulations. Mitigation grant applications and project scopes are closely reviewed to ensure that the proposed or implemented project is compliant with the NFIP and state and local requirements. The FHMP has been working with the BBRS to ensure that the new edition of the State Building Code will be consistent with NFIP construction requirements.

C. Workload Allocation

An estimate of workload allocation is provided below for Fiscal Years 2004 (current) through 2009. Level or near-level funding of the CAP-SSSE is assumed over the period. However, it is assumed that the "Full Funding Alternative" for the Map Modernization Management Support (MMMS) program is provided for the years in question. (See Section IV.) Neither post-disaster assistance nor unforeseen future needs that may be identified by FEMA are included in the estimate. In that event, program activities will be negotiated with the regional office.

Fiscal year	2004	2005	2006	2007	2008	2009	Comments
Floodplain mgmt. plan	10%	8%	5%	5%	5%	5%	Decrease as transition to maintenance.
CAVs	20%	20%	20%	20%	20%	20%	
CACs	5%	5%	5%	5%	5%	5%	
Ordinance assistance	5%	6%	8%	10%	10%	10%	Increase due to map revisions.
Model bylaw update		3%	2%				Update based on new code edition.
Outreach	10%	10%	10%	10%	10%	10%	
CRS assistance	1%	1%	2%	2%	2%	2%	Increase due to added communities.
Map mod assistance	3%	4%	5%	6%	6%	6%	Increase due to map revisions.
Mit. plng.-RPAs	4%	3%	3%	2%	2%	1%	Decrease as initial plans completed.
Bldg. code update	5%	2%				3%	2004 - 2005 = 7th edit.; 2009 = 8th edit.
NEFSMA workshops	1%	1%	1%	1%	1%	1%	
Support HMGP	2%	2%	2%	2%	2%	2%	
Support FMA	1%	2%	5%	5%	5%	3%	Increase due to pilot program.
Support PDM	1%	2%	2%	2%	2%	2%	Increase as more grants awarded.
Conf./reg. mtg. attend	3%	3%	3%	3%	3%	3%	
Staff training	4%	3%	2%	2%	2%	2%	Decrease as new staff trained.
GTA	25%	25%	25%	25%	25%	25%	

It is important to note that the level of effort allocated to CAVs and CACs, while estimated to be constant over the period of FY 2004 to 2009, is substantially lower than allocations in previous years. (See table in section II. B. for the historical trend in the number of CAVs and CACs performed.) This level is considered to be the minimum subsistence level for compliance activities.

D. Program Progress and Performance

The following performance measures, developed in consultation between the FHMP and FEMA Region I, will be used to evaluate the progress of the program in meeting its floodplain management goals and objectives.

CAP-SSSE Performance Measures – Commonwealth of Massachusetts

Outcome/Output	Measurement	Baseline/Target	Primary Activities Supporting Measure	Comments
Maintain or improve the percentage of communities that adopt new maps by the FIRM effective date.	Compare the number of communities receiving new maps with how many adopted the new maps and have compliant ordinances.	Baseline: 100% (no community suspended since 1991) 2005 Target: 100% (see comments) Future Target: 100%	- CAVs - CACs - Ordinance assistance - Model bylaw update - Outreach - Map mod assistance	**Mandatory national performance measure.** Achievement of target is dependent upon providing revised maps to communities sufficiently in advance of town meeting; and coordination of FIRM effective date with town meeting schedules.
Maintain or increase the number of communities enrolled and in good standing in the NFIP.	Compare the number of communities enrolled in the program with the number in subsequent years.	Baseline: 332 (out of 351, or 95%) 2005 Target: 332 (95%) Future Target: add 1 every 5-10 years	- CAVs - CACs - Outreach - Bldg. code update	Most non-participating communities are non- or minimally flood-prone and see little benefit to NFIP participation.
Increase the number of repetitive loss (RL) structures mitigated, with special emphasis on severe repetitive loss (SRL) structures.	Compare the number of repetitive loss and severe repetitive loss structures mitigated as indicated in Bureaunet with the number in subsequent years.	Baseline: RL - 204 (out of 2373, or 9%) SRL - 34 (out of 215, or 16%) 2005 Target: RL - 204 SRL - 34 Future Target: RL - add 5-10 per year SRL - add 2-5 per year	- Mit. plng. - RPAs - Support HMGP - Support FMA - Support PDM - GTA	Mitigation of repetitive loss properties is a current priority of all state mitigation grant programs. Mitigation of severe repetitive loss structures will become a higher priority. SRL totals estimated, as no official list available. Achievement of target dependent on continued mitigation grant funding.

IV. Map Modernization Activities

A. Map Modernization Business Plan

The recently completed Commonwealth of Massachusetts Map Modernization Business Plan sets forth a strategy under which the Commonwealth will increase its participation in FEMA's map modernization process. The primary recommendation of that plan is that FEMA, through the MMMS program, fund the hiring of a new dedicated, full-time, state map modernization coordinator. The specific duties of the state map modernization coordinator are expected to include, as a minimum: (1) update and maintain a detailed database of map revision needs; (2) establish and maintain a prioritized list of needed map modernization activities; (3) provide outreach and assistance to communities where map modernization activities are ongoing or beginning; (4) coordinate the activities of mapping contractors and cooperating technical partners; (5) identify potential future mapping partners at the state and local level; (6) update the map modernization business plan annually.

The new state mapping coordinator would be located within the FHMP, and would work closely with CAP-SSSE funded FHMP staff on all aspects of map modernization, particularly in the area of ordinance adoption. The business plan outlines an ambitious schedule for mapping updates in all 14 Massachusetts counties. This would require adoption of updated ordinances in all 332 Massachusetts communities that participate in the NFIP. However, the needed updates will not be extensive, as most NFIP construction requirements are contained in state regulations rather than in local ordinances. Updates will primarily consist of updating references to the newly issued Flood Insurance Rate Map and Flood Insurance Study.

Due to the nature of local government in Massachusetts, extensive coordination will be required to ensure that map revision schedules coincide with town meeting schedules or other local adoption processes as much as possible. Assuming the requested MMMS funding is provided, the map coordinator would be responsible for most of the coordination effort, while CAP-SSSE funded staff would perform the actual ordinance review and comment. Contact will be established early in the map revision process with the specific local officials responsible for ordinance revisions, to ensure that map revision and ordinance adoption schedules are synchronized.

Because there are no unmapped flood-prone communities in Massachusetts, and a total of only 19 communities currently do not participate in the NFIP, little effort is likely to be required in enrolling any new communities in the NFIP.

With regard to mapping activities, the state mapping coordinator would be responsible for ongoing coordination with mapping contractors and Cooperating Technical Partners (CTPs). CAP-SSSE funded staff would provide technical data from program files related to existing mapping errors, currently unmapped flood-prone areas, etc.

B. CAP-SSSE Support for Map Modernization

As outlined above, CAP-SSSE funded staff will perform ordinance review and comment associated with map updates. While the number of ordinance reviews will likely increase by a factor of 3 or 4, workload has been estimated to only double as a result of economies of scale associated with providing assistance to groups of communities within a county at the same time. The FHMP also anticipates working closely with the appropriate regional planning agencies to increase the efficiency of the ordinance review and update process.

Mapping assistance workload is also expected to double during the 5-year planning period. CAP-SSSE funded staff will be involved in the scoping process to identify and evaluate map revision needs. Technical review of mapping products will also be a major effort during this period.

The emphasis of other activities is also likely to change during the planning period, but without actual increases in workload. Workshops and training efforts will likely focus more on map-related issues, such as those associated with the change of elevation datum from NGVD29 to NAVD88. Similarly, it is expected that a greater portion of the time spent in conducting a CAV or CAC will be involved with map-related issues and questions.

V. Needs Analysis and Gap Assessments

A. Current Funding Levels

If current funding levels are maintained *and adjusted for inflation each year*, it may be possible to maintain current staffing levels dedicated to CAP-SSSE activities. If current funding levels are maintained without adjustment for inflation, CAP-SSSE funding will not continue to support 2.8 FTE. This would necessitate that FHMP staff be shifted to other (state) programs for increased portions of their work time. Even provision of inflation adjustments may not continue to support 2.8 FTE if negotiated fringe and indirect rates or union-negotiated raises and step increases exceed FEMA's inflation adjustment.

The workload allocation table in Section III. C. assumes maintenance of current staffing levels dedicated to CAP-SSSE activities. Under that scenario, assuming no new workload requirements (e.g., need for providing post-disaster assistance to communities), NFIP compliance activities will be maintained at bare subsistence levels. If this fiscal year's level of 24 CAVs is maintained over an extended period, this means that participating communities will be visited an average of approximately once every 14 years. While some high-priority communities could be visited more frequently, in the long run, continued funding at these levels will likely result in compliance problems associated with insufficient close contact with communities.

The only alternative to this approach is equally unappetizing. As can be seen from the workload allocation table, the only activity that requires a substantial enough workload, such that a reduction in that activity could result in a significant increase in compliance activities, is general technical assistance (GTA). A large proportion of the time spent on GTA activities is associated with project and permit reviews, which directly result in ensuring that the project or permit is in compliance with NFIP requirements. Failure to perform these reviews will likely directly result in non-compliant construction. The remainder of GTA activities could only be reduced by failing to respond to direct inquiries received by telephone, letter, or e-mail. This is clearly unacceptable.

It is important to note that if current staff levels cannot be maintained or if a disaster or other unanticipated workload occurs, all activities, including NFIP compliance activities, would need to be reduced even further.

B. Increased Funding Levels

The primary use of CAP-SSSE funding increases would be to increase the level of NFIP compliance activities, particularly CAVs. A reasonable frequency of CAVs for an average NFIP community is once every 5 to 7 years, which would require doubling the number of CAVs currently performed. Further increases in funding would likely next be used to increase the number of outreach activities (workshops and training) provided each year. If additional staff were available, there is easily sufficient demand for outreach and training to support 2 or 3 times the current level of outreach activity.

There are certain key issues associated with the provision of additional CAP-SSSE funding that must be addressed prior to provision of the funding increase. The first requirement is that a source for the additional state 25% match must be identified before the CAP-SSSE funding can be increased. Under current state and agency fiscal conditions, the ability of the agency to provide the required match cannot be assumed. Sufficient lead-time must be given by FEMA to ensure that the match can be obtained.

The second issue is that additional funding cannot easily be translated into additional staff capability. In an agency that has undergone dramatic staff reductions over the past several years, there is no underutilized staff capability that can be quickly transferred to work on CAP-SSSE activities. The additional funding to be provided should be sufficient to hire an additional full-time staff person. With partial funding, the state may not be able to hire qualified part-time staff or interns.

Lastly, FEMA must recognize the lag time between the date of provision of funding and the hiring date of new staff. Recent hiring experience has shown that it takes approximately 6 months from the receipt of funding to hiring date. This lag time must be accounted for when funding is provided and scopes of work are negotiated.