Floodplain Management Updates
Floodplain Management Updates:

- Agricultural Structures Study
- Multi-Family Homes Guidance Documents
- Updating ICC Materials
- Community Customer Experience Initiative
- Programmatic Environmental Impact Statement (P-EIS)
- Endangered Species Act (ESA) – Oregon Updates
Agricultural Structures Study, Background and Phase 1:

- July 2014 US GAO published a study evaluating the effects on the NFIP on farmers in riverine areas
- The report tasked FEMA with updating existing guidance on mitigating the risk of flood damage to agricultural structures
- FEMA initiated Phase 1 of the study in April 2016, which will better define the parameters of a comprehensive study
- Phase 1 provides the structural, insurance and lending considerations for farmers when building or expanding in the floodplain
  - An overview of how agricultural building and contents can sustain flood damages
  - A review of the types of mitigation measure that are required under the NFIP
  - A review of what flood insurance and crop/hail insurance is currently available to farmers
Agricultural Structures Study, Phase 2:

• Phase 2 to include:
  
  • Analysis of new and SD/SI agricultural structures based on building type, function, and contents against the type of floodplain to determine feasibility of mitigation options

• Identify legislative, regulatory and program changes affecting the management of agricultural structures in the floodplain

• Identify how other regulatory programs affect agricultural buildings (UDSA, FDA, distributors)

• Determine number and type of agricultural structures and how they are insured

• Explore how the special rating guidelines are applied to agricultural structures and the types of mitigation techniques that would result in reduced risk/rates
Multi-Family Home Guidance Documents:

• Under this new effort, Building Science and Floodplain Management will work to identify flood resistant techniques for new construction and retrofitting aged mid-rise/high-rise multi-family structures.

• We are considering the revision and production of Policy, Guidance, and Training Materials to support community officials and design professionals responsible for the construction and retrofit of Multi-Family structures.

• The analysis of how multi-family midrise/high rise structures performed after a flood event

• Develop flood resistant design techniques that can improve the resiliency of multi-family building after a disaster, while identifying alternative flood resistant solutions that will not comprise public safety and property protection.
Updating ICC Materials:

• Office of the Flood Insurance Advocate found that there is widespread confusion among policyholders, community officials, insurance adjusters, and State and FEMA floodplain management personnel regarding what is required to initiate an ICC claim.

• FEMA’s guidance documents to local officials and insurance claims adjusters is inconsistent with direction given by the FIMA Claims Branch leadership, who encourages claims examiners to question the veracity of community substantial damage determinations.

• The program’s guidance appears unfair because FEMA’s guidance documents do not discuss in enough detail the requirements of filing of an ICC claim.
Updating ICC Materials:

- **Recommendations**
  
  - The Building Science Branch should update FEMA P-758, Substantial Improvement/Damage Desk Reference 2010, by adding a discussion on the specific documentation required in the community’s substantial damage determination to trigger an ICC claim to be made by the insured.
  
  - It is further recommended that the Floodplain Management Division update the FEMA 301, NFIP Increased Cost of Compliance Coverage – Guidance for State and Local Officials, 2003.
  
  - The program offices develop additional educational materials to educate stakeholders about the ICC process, including how ICC can be combined with hazard mitigation grants as a cost match.
Community Customer Experience

• Following Sandy, we realized some **challenges in our policyholder customer experience**. In response, we launched a major CX transformation focused on our policyholders

• We now have an opportunity to **apply the same thinking to our communities**. We think this is the right thing to do, for a few reasons:
  
  – **We can probably do a better job** in improving the community customer experience. Do we know how we're doing today? Are our communities engaged in the way we want them to be?
 
  – **We can help introduce more customer-centered thinking across FIMA** more broadly, specifically within Mitigation (vs. policyholder focus in Federal Insurance)

  – **We can help spread CX best practices and capabilities** to the rest of FEMA, centered around the community as our customer
NFIP - Programmatic Environmental Impact Statement (PEIS)

- FEMA is preparing a NEPA analysis for the NFIP
- Scoping was conducted in 2014
- FEMA anticipates publishing a Draft PEIS in the Summer of 2016
- This Draft is meant to solicit public/stakeholder input
NFIP in Oregon – ESA History

• 2010 – Settlement agreement reached
  • CLOMR-Fs – Shown no detrimental habitat impacts
  • Consult with NMFS
• 2011 – FEMA requested consultation with NMFS
• 2012 – Consultation with NMFS initiated
• 2012 – FEMA Program Level Biological Assessment (amended in 2013)
• April 14, 2016 – Oregon Bi-Op issued – Jeopardy/Adverse Modification
  • NMFS offered a Reasonable and Prudent Alternative
• FEMA has reached out to OR communities to begin the process of engagement on implementation