
**NFIP Stakeholder Listening Session:
Findings & Next Steps**
Phase I Report



FEMA

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I. OVERVIEW

Background and Purpose

In performing its mission, the Federal Emergency Management Agency (FEMA) believes it is important to continually seek input from its many stakeholders on how its programs can be more efficient and effective at meeting the needs of the public. To this end, FEMA has engaged in a comprehensive reform effort to address the concerns of the wide array of stakeholders involved in the ongoing debate about the National Flood Insurance Program (NFIP). The effort is comprised of three phases designed to engage the greatest number of stakeholders and consider the largest breadth of public policy options. Phase I focuses on the capture and analysis of stakeholder concerns and recommendations. During the second Phase, FEMA will perform additional analysis of existing data and develop a portfolio of public policy alternatives. In Phase III the public policy alternatives will be evaluated using a standard set of criteria and the resulting recommendations will be reported (see Figure 1 below for a graphical outline of this process).



Figure 1. NFIP Reform Process

Phase I commenced with the NFIP Listening Session held November 5-6, 2009 in Washington, DC. The goals of this Listening Session were to engage invited stakeholders from Federal, state, local and tribal governments, associations, non-profits and the private sector, to hear about the key issues facing the program, identify common understanding between groups and document the diversity of opinions concerning the optimum implementation of the NFIP (See Appendix A for a complete list of participating organizations). In addition to the comments received during the Listening Session, FEMA also opened a comment period via the web for the public to submit additional comments for inclusion in future analysis efforts (See Appendix B for a complete list of comments received during the Listening Session and during the web comment period). This Report provides a summary of FEMA’s analysis of the comments received during the Listening Session as well as the subsequent web comment period.

Process

The NFIP Listening Session was held November 5-6, 2009 in Washington, DC. Day 1 featured remarks by Craig Fugate, FEMA Administrator, the Honorable Alice C. Hill, Department of Homeland Security (DHS), Senior Counselor to the Secretary and Edward Connor, Acting Flood Insurance Administrator; a panel presentation by five diverse stakeholders; and six breakout sessions. During the breakout sessions, participants were presented with a unique topic and asked to identify issues that FEMA should take into account as it considers NFIP reform in that area. The following is a list of the topics from the Day 1 breakout sessions:

- Topic 1: Subsidizing Risk
- Topic 2: Mapping/Risk Identification and Communication
- Topic 3: Mandatory Purchasing/Affordability
- Topic 4: The NFIP and Environmental Issues
- Topic 5: Actuarial Soundness of NFIP
- Topic 6: Types of Hazard Insurance Available and the Level of Coverage That May Be Purchased

At the end of Day 1, five cross-cutting issues were selected for the Day 2 breakout discussions. During the Day 2 breakout sessions, participants were asked to identify ideas related to potential solutions for each of the five issue areas. The following is the list of the selected cross-cutting issues:

1. What are the strategies for addressing residual risk?
2. How might the Federal government improve its role in the insurance industry?
3. What are strategies for making insurance premiums more affordable?
4. What are the next steps with regard to land use and environmental management? Now that communities understand land use, how do we equip them to be more proactive?
5. How do you relate mapping, building practices and insurance?

Day 2 ended with summary presentations from stakeholders and remarks from Craig Fugate, FEMA Administrator and the Honorable Alice C. Hill, DHS, Senior Counselor to the Secretary.

Immediately following the Listening Session, FEMA's supporting consultant analyzed the stakeholder comments. Using a multi-step process, key themes and sub-themes were identified across all of the breakout session topics for both days. Specific steps taken to complete the analysis were:

1. Organized comments by day/topic;
2. Reviewed comments for general themes;
3. Summarized prevalent themes;
4. Assigned comments to the appropriate theme(s); and
5. Calculated the frequency for each theme across topics.

The analysis culminated in a report titled, *Content Analysis of Breakout Session Comments*¹, and was posted on FEMA's website for a period of review. In addition to the comments received during the Listening Session, FEMA also opened a comment period through the web for the public to submit additional comments for inclusion in future analysis efforts. This comment period was open from the end of the Listening Session until January 31, 2010.

During the comment period, FEMA leadership established an internal working group, comprised of a cross-section of FEMA Mitigation Directorate staff representing the Risk Reduction, Risk Insurance, Risk Assessment and Environmental and Historic Preservation (EHP) business lines. The Working Group reviewed all of the original comments received from the Listening Session, the comments received

¹ Federal Emergency Management Agency. (2009, December). *Content Analysis of Breakout Session Comments*. Retrieved from http://www.fema.gov/business/nfip/nfip_listening_session.shtm.

during the web comment period, as well as the report, *Content Analysis of Breakout Session Comments*. Each business line within the Directorate completed a more detailed analysis of the data related to their area, and gained valuable input from staff and leadership from their respective organizations. With this further level of analysis, the Working Group identified specific “Themes” and “Sub-Themes” related specifically to each business line (see Figure 2 below for a graphical outline of Phase I).

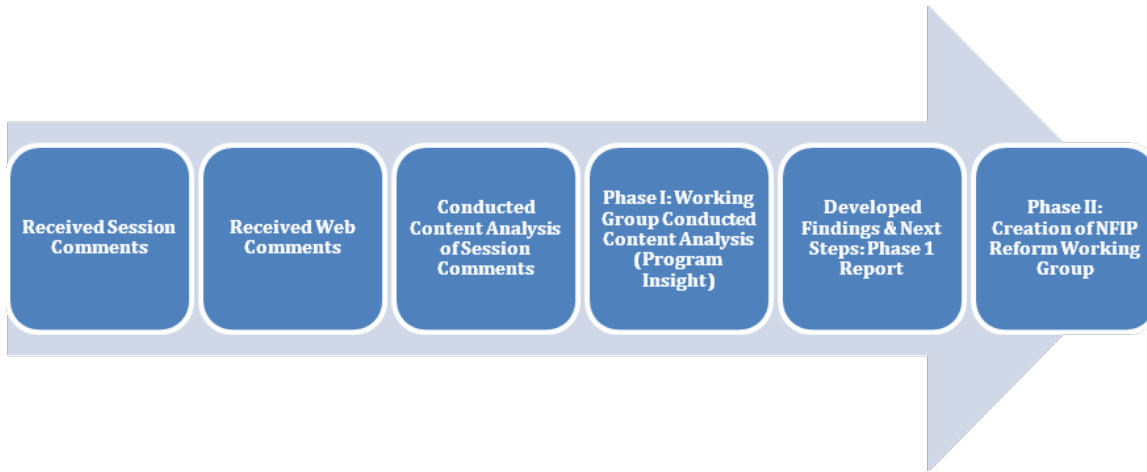


Figure 2. NFIP Phase I Process

II. FINDINGS

The following findings describe “what we heard” from the NFIP Listening Session and comments received during the web comment period. In order to manage the large number of ideas, comments and feedback received, the Working Group has organized this data into “Themes” and “Sub-themes” (where appropriate) related to each of the FEMA Mitigation Business Lines; Reducing Risk, Insuring Risk, and Assessing Risk, as well as those related to EHP and those identified as Mitigation-wide.

Reducing Risk

Improve Communication, Outreach and Training on Building Sciences, Floodplain Management and the NFIP

A number of the comments received illustrated a need for FEMA to improve risk communication, outreach and training on building sciences, floodplain management and the NFIP primarily for local officials. The following bullets provide some key points:

- Better communicate hazards versus risks;
- Promote good land use not just floodplain management;
- Make locals knowledgeable (accountable) for development decisions in risky areas;
- Deliver more training to increase community engagement;
- Increase training for communities about non-NFIP requirements that impact the administration of local floodplain management requirements such as the Endangered Species Act (ESA), E.O. 11988, historic structures, etc.;
- Deliver more floodplain management training for smaller, understaffed communities;
- Educate local officials on how to acquire historical claims data for possible mitigation projects;
- Consider what special measures/assistance is needed for tribal communities.

Improve Federal Interagency Coordination in Floodplain and Other Hazardous Areas

A portion of the comments requested that FEMA improve interagency coordination among Federal agencies that fund and conduct activities in floodplains or hazardous areas. The following bullets provide some key points:

- Reestablish the US Water Resources Council with Cabinet-level support with a first key activity focusing on floodplain management;
- Develop the Unified National Program for Floodplain Management (UNPFM) to coordinate floodplain management among all agencies;
- Develop a national hazard mitigation policy that emphasizes stronger standards, including rules that require new homes and businesses to be located in areas safe from flooding;
- Communities should be required to prohibit all government subsidized development from mapped very high hazard areas;
- Recognize the practices of other Federal programs that impact floodplain development and modify them in ways that are likely to promote sound water resources management policies;
- Restructure Federal program funding to recognize that measures like levee construction, that have received ample subsidies in the past might see their subsidies reduced or eliminated, while others such as encouragement for individual home retrofitting, may be prudent places for government to invest additional resources;

- Expand Community Rating System (CRS) examples to incentivize good behavior to other Federal agencies involved in communities including reduced disaster and non-disaster program cost-shares for Environmental Protection Agency (EPA), Department of Housing and Urban Development (HUD), Department of Agriculture (USDA), etc.

Higher Regulatory Standards

A portion of the comments received requested that FEMA should require local adoption of development standards that place more restrictions or add new prohibitions in identified flood hazard areas. Recommendations fall into two categories 1) floodplain area/zones, and 2) construction standards. The following bullets provide some key points:

- Floodplain Area/Zones:
 - Prohibit the use of fill in floodplains
 - Establish no-build High Hazard areas specifically citing Erosion zones, Floodways, V or Coastal A Zones
 - Consider the following in relation to development in flood plains:
 - i. No Adverse Impact (NAI) principles
 - ii. Natural and beneficial floodplain functions
 - iii. Sea-level rise/climate change
 - iv. Future/ultimate development
 - v. The requirements of the Endangered Species Act (ESA)
- Higher Floodplain Construction Standards:
 - Add freeboard of 1-3 feet
 - Open foundations in A zones
 - V Zone standards in Coastal A Zones
 - No enclosures in coastal areas
 - Require cumulative substantial damage and substantial improvement determinations for existing buildings

Improve Implementation of Existing Floodplain Management Standards, Policies and Practices

Various comments requested that FEMA improve the implementation of the NFIP's existing floodplain management standards, policies and practices. The following bullets provide some key points:

- Improve community enforcement of substantial damage and substantial improvement; clarify and revise definition and requirements;
- Revise 11988 Executive Order on floodplain management and apply uniformly throughout FEMA;
- Examine or toughen implementation and enforcement of FEMA's minimum standards in communities;
- Better use of CRS incentives to encourage local changes, including credits for natural benefits;
- Investigate concept of community peer reviews for certain NFIP requirements (e.g. substantial damage/substantial improvement determinations);
- Strengthen local community ties between floodplain management and building codes.

Promote Mitigation Using Existing Tools

A portion of the comments received focused on mitigating risk using existing tools and improving the handling of repetitive loss properties. The following bullets provide some key points:

- The NFIP should enact modified regulations to better address the impact of severe repetitive loss and repetitive loss properties.
- FEMA underutilizes programs to reduce risk via mitigation measures.

Insuring for Risk

Premiums That Reflect Risk

A portion of the comments received focused on eliminating the pre-FIRM subsidy, eliminating grandfathering and surcharging repetitive loss properties. The following bullets provide some key points:

- The NFIP is faced with a situation in which Pre-FIRM policyholders are provided statutorily mandated subsidies that do not reflect actuarial risk.
- Reduce the number of grandfathered properties at a specific future date as this broad class fails to properly communicate the flood risk of individual properties.
- Some poorly situated structures experience repeated flood losses, which are not reflected in their flood insurance rate and hence, are a drain on the NFIP.

Mandatory Purchase

A portion of the comments received focused on mandating the purchase of flood insurance in all flood risk areas and providing income-based subsidies. The following bullets provide some key points:

- Flood insurance is not currently required behind levees that are accredited with providing protection against the 100-year flood, in the 500-year floodplain, in residual risk areas, and in other special high hazard areas. Including these special hazard areas on flood maps and requiring the purchase of flood insurance in all risk areas would better protect the public and communicate the actual risk.
- Not all property owners or renters can afford to purchase flood insurance even though it is in their interest to do so. Providing a subsidy based on income is one way to make flood insurance premiums more affordable to owners and renters.

Flood Insurance Product

A portion of the comments received focused on the increasing of coverage limits and simplifying the flood insurance rating system. The following bullets provide some key points:

- Coverage limits should better reflect current property values. For example, \$250,000 limit of NFIP coverage on 1-4 family home and multi-family buildings is too low.
- In order to determine how much to charge for the insurance, the NFIP needs information about the flood hazard, the location and elevation of the structure relative to the flood hazard, and

information about the structure itself. Some of this information is easily obtained from the homeowner and some is not, hence the need for a simpler way to determine rates.

Fiscal Soundness

A portion of the comments received focused on substantial damage and improvement, debt forgiveness and the desire to have funds appropriated to cover premium shortfalls resulting from pre-FIRM subsidy. The following bullets provide some key points:

- The substantial damage requirement has been by far the most difficult NFIP requirement for communities to enforce. Property that has only cosmetic damage or minor structural damage will generally not be declared “substantially damaged.”
- There is no provision in the NFIP’s insurance premium structure to repay the debt and service it. Without continuing to borrow to service the debt, the NFIP cannot afford the expense of operating the insurance program, funding map modernization efforts and running flood mitigation programs.
- An annual appropriation from the Congress for the amount of the Pre-FIRM subsidy could provide the NFIP with the funds that would be collected if these policies had paid actuarial rates. The appropriation could also include the cost of the subsidy in the Federal government’s annual budget.

Assessing Risk

Improve Risk Maps

A portion of the comments received pertained to mapping and the incorporation of multiple hazards and recurrence intervals into maps. The following bullets provide some key points:

- Flood Insurance Rate Maps (FIRMs) should show multiple hazards, such as erosion and dams;
- FIRMs should have new or modified zone designations;
- Studies should consider flood frequencies other than the base (1-percent-annual-chance) flood;
- FIRM accuracy should be increased to include more detail, and/or to reflect current data;
- FIRMs should include new layers of information, such as wetlands, endangered species areas, velocities, and depths;
- The Coastal A zone designation should be clearly identified;
- FIRMs should show residual risk.

A portion of the comments received pertained to facilitating and improving the usability of maps. The following bullets provide some key points:

- FIRMs should be able to be updated quickly so as to reflect changing conditions;
- FIRMs should become more interactive;
- FIRMs should reflect “true” risk to life and property.

A portion of the comments received pertained to accurately mapping and communicating the risk behind levees. The following bullets provide some key points:

- A zone designation should be developed specific to levees;
- FIRMs should communicate residual risk of levees clearly;

- FIRMs should be produced and updated with cooperation from the United States Army Corps of Engineers (USACE) for consistency;
- Multiple layers should be developed and included as part of the FIRM to represent various hazards.

Communication Must Become a Priority

A portion of the comments received that related to communications pertained to outreach and revealed a desire for increased education for both local officials and end users of FEMA mapping products. The following bullets provide some key points:

- Stakeholders feel the need for constant and personalized communication so that community residents fully understand their personal level of risk.
- Partnerships with communities, the media, the insurance industry, the real estate industry, and other organizations that have a vested interest in floodplain management could help strengthen communication of floodplain management and mitigation.

A portion of the comments received that related to communications pertained to simplifying map terminology so that the average property owner can readily understand their risk. The following bullets provide some key points:

- There is a need for the general public to know and understand their personal risk, and clear communication is the key to conveying that message.
- Maps should be accessible to everyone.
- There is a need to increase digital distribution, but also maintain means for traditional distribution to allow equal access to all.

In addition, some of the comments received that related to communications pertained to residual risk and expressed the need for the issue to be better defined and communicated, even if that means using a simplified term for residual risk. The following bullets provide some key points:

- The public could better understand residual risk, in particular how it affects them directly if it were identified through more commonly understood phrases, for e.g. community risk or actual risk.
- The term residual risk is misleading. There is a risk from flooding in all areas. We need to define the flood hazard in terms of risk for all land mass. It seems when you use a term "residual" risk or any label it suggests the risk is equal in areas included in that label.

Enhance Technical Basis of Risk Assessment Data

A portion of the comments received pertained to better utilization of technology to collect and display data. The following bullets provide some key points:

- Geographic Information System (GIS) layers should be developed to show multiple hazards on FIRMs;
- Digital FIRMs (DFIRMs) should expand the use of GIS to collect and analyze more data, such as structural, historical (flooding and districts), parcel and environmental data;
- Flood maps should be more dynamic by incorporating real time data;
- Incorporation of LiDAR (Light Detection and Ranging) data in flood studies should be coordinated;
- DFIRM and flood study data should be shared among other agencies/stakeholders;

- Sharing data would lead to more dynamic uses of the data as it would allow users to manipulate the data as needed.

In addition, a portion of the comments received pertained to improving, verifying, and expanding the science used in the flood study process emphasized a more comprehensive approach to the science behind the flood study process. The following bullets provide some key points:

- Climate change and flooding are interrelated, therefore climate change and/or future conditions should be analyzed and considered in flood studies;
- Future flood studies should also consider items such as historical conditions, water quality, the natural and beneficial functions of floodplains, and cumulative impacts of man-made and/or natural changes;
- A watershed-based approach should be used when conducting flood studies;
- The “standard” of the one-percent-annual-chance flood used for flood studies should be evaluated to include other frequencies.

Promote Integrated Support to Communities

A portion of the comments received pertained to financial support to communities. The following bullets provide some key points:

- FEMA should continue to increase financial support to communities and Cooperating Technical Partners (CTPs) for their floodplain management efforts.
- Funds should be provided to train and educate local communities to better understand and use risk maps
- Rewards should be given to deserving communities (i.e. those with high CRS ratings and those promoting mitigation projects) with additional mitigation grant funds
- Financial support should be provided for buyouts.

Comments received pertained to coordination and communication, and revealed that people want to hear one voice from governmental agencies and see integrated policies. The following bullets provide some key points:

- FEMA should coordinate on various flood-related and mapping issues with the USACE, tribes, the National Park Service, the National Register, State Historic Preservation Offices, the EPA, the United States Geological Survey (USGS), and the National Oceanic and Atmospheric Administration (NOAA).
- There needs to be stronger partnerships between Federal, State, and local governments in order to improve floodplain management. These partnerships would lead to improved data coordination, stronger building codes that will better mitigate risk, more accurate maps based on local knowledge, and integrated “one voice” risk communication.

Evaluate, Improve and Enforce Existing Regulations and Guidelines

The comments requested regulatory and guideline changes related to risk assessment and mapping. The following bullets provide some key points:

- Evaluate FEMA 44 Code of Federal Regulations (CFR) 65.10 – mapping of areas protected by levee systems;

- Disconnect mapping from insurance;
- Reevaluate the floodway surcharge limit, freeboard requirements, coastal erosion setbacks, coastal building zones, and historic structure requirements;
- Prohibit development in high hazard and environmentally sensitive areas.

In addition, some comments expressed the need for more coordination on the local level regarding how the NFIP regulations relate to historic structures and how these regulations can be improved to meet multiple objectives. The following bullets provide some key points:

- FEMA could improve coordination with local communities in order to help the communities enforce regulations.
- A need was also expressed for strengthening policy to ensure sound floodplain management practices are being enforced.

Promote Hazard Mitigation

The comments requested that FEMA better identify and communicate the benefits of hazard mitigation with respect to the following areas:

- Environmental conservation
- Land use
- Parcel data
- Mitigation projects in place
- Historic preservation

In addition, other comments noted that previous damage should be considered when conducting hazard mitigation planning and communicating risk, and that the communication of residual risk needs to be clearly articulated and focused on non-structural hazard mitigation.

The comments requested FEMA integrate hazard mitigation with other planning efforts. The following bullets provide some key points:

- Enabling the connections between land use and hazard mitigation is key to understanding environmental management;
- The Federal government should require comprehensive floodplain management plans for community participation, and those plans should be integrated with watershed-level plans;
- FEMA should engage property owners in hazard mitigation planning.

Environmental

Use Partnerships and Incentives to Achieve the Preservation and Restoration of Floodplains Natural Resources and Functions in the NFIP

A significant number of comments encouraged FEMA to accomplish the preservation and restoration functions of the NFIP through use of partnerships and incentives. The following bullets provide some key points:

- FEMA should build and rely on stronger partnerships with the local governments, non-governmental organizations (NGOs) and other agencies to achieve the goal of integrating the consideration of natural and beneficial functions protection and preservation. Some local communities already protect natural resources in the floodplain through their own laws, ordinances and requirements and FEMA should encourage this behavior rather than mandate it.
- FEMA should incentivize the protection of the environment and floodplain resources for those communities that do not have such standards and ensure that adequate training and outreach is made to those communities to encourage the desired behavior.
- FEMA and the NFIP are not and should not be environmental protection programs. However, the same environmental protection goal could and should be achieved through more stringent floodplain management standards that take into account safety.
- FEMA should encourage more buyouts (acquisitions) and remove barriers that discourage this project type.

Engage in Environmental Planning Efforts at a Programmatic Level

A number of comments suggested the application of environmental planning processes to the NFIP on a program level. The following bullets provide some key points:

- Examples of these included the revision of the NFIP Programmatic Environmental Impact Statement and engaging in consultation under the Endangered Species Act for the entire program.
- Other statements suggested the need to better account for historic properties through the program and the potential impacts of the program's implementation on historic properties.
- Some comments recommended a uniform application of the Executive Order (EO) 11988, Floodplain Management, to the program.
- They also suggested a more transparent EO 11988 process that would allow the public to view how FEMA responded to a request for EO 11988 comment or review from another Federal agency or applicant.

Develop and Encourage Stricter Floodplain Management Criteria

A majority of comments suggested revisions of the minimum floodplain criteria standards as a method to enhance the protection of the natural environment. The following bullets provide some key points:

- Ideas on this regard included prohibiting fill in the floodplain, prohibiting development in certain areas of the floodplain, and incorporating Low Impact Development (LID) measures into the minimum criteria.
- CRS was seen as a useful method to encourage consideration of environmental factors into the program's implementation. However, comments indicated that CRS should be simplified and encouraged more.
- Ideas for encouraging CRS participation included receiving benefits in the disaster assistance operation (e.g. reducing cost/share requirements) and other benefits to the community as opposed to the individuals from the community.
- Various comments raised concerns about the costs of managing the program, in particular enforcing the floodplain management criteria.
- Some comments suggested FEMA take into account the resources needed to enforce the criteria and to participate in the CRS.

Consider Watershed Approaches and Take Holistic Approach to the Implementation of the NFIP

One of the common themes expressed in the comments was the consideration of watershed planning for floodplain management purposes. The following bullets provide some key points:

- Some comments indicated that FEMA should require communities to base their decisions and to manage their floodplains using watershed planning.
- A significant number of comments raised concerns about the lack of coordination among the Federal agencies when it comes to floodplain management.
- Comments suggested the reestablishment of the Floodplain Management Task Force and develop the Unified National Program for Floodplain Management.

Change Mapping Practices by Taking into Account Environmental Factors

A number of comments suggested the incorporation of natural resources into the floodplain maps, such as endangered species habitat. They provided that information regarding natural resources and beneficial functions of the floodplain should be a layer of information available to the public and planners in addition to flood risks. In addition, comments suggested that FEMA should take into account climate change, sea level rise, and future conditions into the flood maps. Other comments recommended the delineation and prohibition of construction in coastal A zones. The following bullets provide some key points:

- Include digital area location of key environmental resources and natural and beneficial functions values as layers with NFIP maps
- Maps need to incorporate and display environmentally sensitive areas.
- With move to digital risk maps, accommodate and encourage information layer that shows area of environmental concern.

Mitigation-wide

Rethink the NFIP

The comments received focused on tying community based insurance to the property tax system and whether to privatize or not privatize the NFIP. The following bullets provide some key points:

- Community-based delivery of the flood insurance product could potentially insure all at-risk structures in a community and lessen the burden on homeowners because premiums would be paid through property tax assessments. Communities would be involved in identifying their flood risk and would have the incentive to mitigate flood risk to lessen the insurance premiums paid by their citizens.
- Encourage the entry of private insurers directly into the flood insurance market to begin competing with the NFIP.
- Continue to bring the private insurance industry professionals into the discussion to offer insight into how they have successfully operated in the insurance profession from a lessons learned approach.

III. NEXT STEPS

Following the analysis of the Listening Session data, FEMA convened an internal NFIP Reform Working Group comprised of a cross-section of Mitigation Directorate staff. The Working Group is tasked with identifying and analyzing options for the future state of the NFIP. This Phase II effort will incorporate the recommendations and themes resulting from the NFIP Listening Sessions and web comments, presented in this Report. In addition, the group will comprehensively review prior evaluations of the NFIP including the *Call for Issues Status Report* (1998-2000)², *The Evaluation of the National Flood Insurance Program Final Report* and other reports conducted by the American Institute for Research (2006)³ and several reports by the Government Accountability Office (GAO)⁴. The NFIP Reform Working Group will utilize the data provided by each of these studies to define policy alternatives and systematically evaluate each option against a set of standard criteria. The results of this analysis will serve to inform the decision-making process regarding the future of the NFIP.

IV. APPENDIX

- A. *Acronym Guide***
- B. *NFIP Listening Session, List of Participating Organizations***
- C. *NFIP Listening Session and Web Comments, November 5, 2009 – January 31, 2010***

² Federal Emergency Management Agency. (2000, June). *Call for Issues Status Report*. Retrieved from <http://www.fema.gov/library/viewRecord.do;jsessionid=3FC3A8CB6210AE66C449C51FF81469F0.Worker2Library?action=back&id=3082>.

³ Available at: <http://www.fema.gov/business/nfip/nfipeval.shtm>.

⁴ Available at: <http://www.gao.gov/docsearch/repandtest.html>.

<i>Acronym Guide</i>	
A99	Annual Accountability Report FY 99
AC	Annual Chance
ACWI	Advisory Committee on Water Information
AE Zone	Area of Special Flood Hazard
Ag	Agricultural
AIR	American Institutes for Research
AR	Annual Accountability Report
AutoCAD	Computer Aided Design or Computer Aided Drafting
BCA	Benefit-Cost Analysis
BFE	Base Flood Elevation
CAV	Community Assistance Visit
CDBG	Community Development Block Grant
CFR	Code of Federal Regulations
CRS	Community Rating System
CTP	Cooperating Technical Partners
DFIRMS	Digital Flood Insurance Rate Maps
DHS	United States Department of Homeland Security
DWR	Department of Water Resources
EHP	Environmental and Historic Preservation
EO	Executive Order
EPA	United States Environmental Protection Agency
ESA	Endangered Species Act
ESF	Emergency Support Function
F&WS	Fish and Wildlife Service
FEMA	Federal Emergency Management Agency
FIA	Flood Insurance Administration
FIRM	Flood Insurance Rate Map
FIS	Flood Insurance Study
FP	Floodplain
FPM	Flood Plain Management
FWS	Fish and Wildlife Service
GAO	Government Accountability Office
GIS	Geographic Information System
H&H	Hydraulic and Hydrologic
HAZUS	Hazards-United States (risk model)
HDDS	Hazards Data Distribution System
HMGP	Hazard Mitigation Grant Program
HQ	Headquarters
HR	United States House of Representatives

<i>Acronym Guide</i>	
HSIN	Homeland Security Information Network
HUD	United States Department of Housing and Urban Development
IBHS	Institute for Business and Home Safety
ICC	Increased Cost of Compliance
IPaC	Information, Planning and Consultation System
LEED	Leadership in Energy and Environmental Design
LID	Low Impact Development
LIDAR	Light Detection and Ranging
LOMA	Letter of Map Amendment
LOMC	Letter of Map Change
LOMR	Letter of Map Revision
LVC	Local Village Commercial
NAI	No Adverse Impact
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NGO	Non-Governmental Organization
NHD	National Hydrology Dataset
NIST	National Institute of Standards and Technology
NOAA	National Oceanic and Atmospheric Administration
NRCS	National Resources Conservation Service
NRDC	Natural Resources Defense Council
NRF	National Recovery Framework
NWS	National Weather Service
OIG	Office of Inspector General
P/C	Property/Casualty Insurance
PA	Public Assistance
PIO	Public Information Officer
PRP	Preferred Risk Policy
Q	Mathematical Notation for Discharge
R&D	Research and Development
RCBAP	Residential Condominium Building Association Policy
RCV	Replacement Cost Value
REO	Regional Environmental Officer
RLP	Repetitive Loss Property
SBA	Small Business Administration
SCS	Soil Conservation Service
SD/SI	Substantial Improvement/Substantial Damage
SFHA	Special Flood Hazard Areas
SLOSH	Sea, Lake and Overland Surges from Hurricanes
SRL	Severe Repetitive Loss

<i>Acronym Guide</i>	
SRLP	Severe Repetitive Loss Program
T&E	Threatened and Endangered
TNM	The National Map
UNPFM	Unified National Program for Floodplain Management
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USGS	United States Geological Survey
WYO	Write-Your-Own
X Zone	Area of Minimal Flood Hazard

<i>NFIP Listening Session – List of Participating Organizations</i>	
1	Allstate Insurance Company, Institute of Business and Home Safety
2	American Bankers Association
3	American Bar Association
4	American Council of Engineering Companies
5	American Institute of Architects
6	American Insurance Association
7	American Public Works Association
8	American Red Cross
9	American Rivers
10	American Society of Civil Engineers
11	Applied Technology Council
12	Association of American State Geologists
13	Association of State Flood Plain Managers
14	Association of State Wetland Managers
15	Borough of Keansburg
16	California Department of Water Resources
17	Chehalis Tribe
18	City of Grand Island
19	City of Montpelier, VT
20	City of West Sacramento
21	Coastal States Organization
22	Congressional Budget Office
23	Connecticut Department of Environmental Protection
24	County of Peoria, IL
25	County of Pierce, WA
26	County of Sarasota, FL
27	Department of Housing and Urban Development
28	Environmental Law Institute
29	Farm Credit Administration
30	Federal Deposit Insurance Corp.
31	Federal Housing Authority
32	Federal Reserve Board
33	Federal Emergency Management Agency, HQ and 10 Regions
34	Financial Markets and Community Investments
35	Flood Insurance Producers National Committee
36	Flood Insurance Servicing Companies Association of America
37	Freddie Mac
38	H2O Partners, Inc.
39	House Appropriations Committee
40	House Financial Services Committee
41	House Transportation and Infrastructure Committee
42	Independent Insurance Agents and Brokers of America



<i>NFIP Listening Session – List of Participating Organizations</i>	
43	Institute for Business and Home Safety
44	Insurance Services Office
45	International Association of Emergency Managers
46	Jefferson Parish Emergency Management
47	Louisiana State University Agriculture Center
48	Milwaukee Metropolitan Sewerage District
49	National Association Flood and Storm water Management Officials
50	National Association of Counties
51	National Association of Homebuilders
52	National Association of Insurance Commissioners
53	National Association of Professional Insurance Agents
54	National Association of Realtors
55	National Conference of Insurance Legislators
56	National Conference of State Historic Preservation Officers
57	National Emergency Management Association
58	National Fire Protection Association
59	National Flood Determination Association
60	National Governor's Association
61	National Hydrologic Warning Council
62	National Institute for Building Sciences
63	National Institute for Standards and Technology
64	National League of Cities
65	National Lenders Insurance Council
66	National Oceanic and Atmospheric Administration
67	National Wildlife Federation
68	Natural Hazard Mitigation Association
69	Natural Hazards Center
70	Nielsen Associates
71	Office of Management and Budget
72	Office of the Comptroller of the Currency
73	Office of Thrift Supervision
74	Ohio Department of Natural Resources
75	Oklahoma Water Resources Board
76	PBS&J
77	Planning and Development Department
78	Property Casualty Insurers Association of America
79	Representative Jerry Costello's Office
80	Representative Matsui's Office
81	Resources for the Future
82	Risk Management Services
83	Senate Committee on Disaster Recovery
84	Senate Subcommittee on Homeland Security



<i>NFIP Listening Session – List of Participating Organizations</i>	
85	State Emergency Management Agency
86	State Farm Flood Service Office
87	State of North Carolina
88	State of Oregon
89	Story County, IA Emergency Management
90	The Competitive Enterprise Institute
91	The Council of Insurance Brokers and Agents
92	US Army Corps of Engineers
93	US Department of Agriculture
94	US Department of Homeland Security
95	US Department of Treasury
96	US Fish and Wildlife Service
97	Weather Predict Consulting
98	West Virginia Division of Homeland Security/ Emergency Management
99	Wild Earth Guardians

NFIP Listening Session and Web Comments

Day 1 Topic 1: Subsidizing Risk	
#	Notes/Comments
1	Spreading the risk among larger pool - instead of tying it to "mortgage loans" - making, extending, renewing, increasing, etc.
2	Can risk pool be increased to include all property owners, regardless of mortgage status?
3	Premiums - provide for claims history analysis as part of pricing models. Offer consumers incentives to improve properties and offer credits/discounts for good claim history at renewal of policies
4	No. We are encouraging bad behavior when we subsidize pre-existing properties. Local enforcement and determination of 50% "market value" is a problem. Local officials have no incentive to encourage properties to be upgraded, and/or removed/rebuilt in better locations. There is a disincentive for communities to enforce requirements on existing structures - should be other way around!
5	Will setting premiums to a risk-based level result in a decrease in property values? Will that be considered a taking?
6	What strategies exist to discourage or prevent development in high-risk areas? Should the premiums be established to provide such incentives?
7	Substantial damage needs to be cumulative
8	Must convert <u>ALL</u> policies to actuarial-40 years is <u>LONG</u> enough to transition
9	To the extent there are going to be subsidies in the program, they should be directed to low and moderate income residents. Everyone else should be required to pay for the risk they are assuming. If they don't like the rate, they shouldn't live in the floodplain. Phase out pre-FIRM subsidies
10	There is no question that the NFIP is encouraging development in high risk areas, mostly along the coast that dramatically increases the cost to the program, taxpayers, private insurers for wind damage, and increases loss of life and injury. The solution is actuarial rates, either by privatizing or by running the program with proper rates. Either way, appropriate rates would properly indicate the risk people and communities are taking when they locate in harm's way.
11	May not be the correct session - But the subsidy program requires banks to engage in difficult determinations on flood zone discrepancies - is it the result of grandfathering?
12	Incentives to move to safer areas - a) Tax code b) IA Relief c) Behavioral messages "Live Safer" - everywhere d) PA for community's ties to "no build areas." (% of match) e) 10 year rate changes upward with-in Pre FIRM areas f) Give congress the knife to cut the cake - see what results in their Districts
13	If no NFIP in high risk areas: It's hard to predict behavior without knowing - all facts, but I guess a) more affluent families will still move to attractive flood - prone areas. Evidence: limits of NFIP now don't cover properties worth \$300K and above - b) Poorer individuals will remain in flood prone areas (unless mandatory purchases) and be unable to and more. They will then look to public finds (IA). - What other incentives or disincentives will accomplish wise locations for structures?
14	Actuality vs. perception public assistance and individual assistance and CDBG are in conflict with NFIP
15	Consider flood insurance as auto insurance - communities require flood insurance just as auto insurance as automatic as property taxes.

Day 1 Topic 1: Subsidizing Risk	
16	Everyone in risk zone pays flood insurance as part of property taxes - maybe community umbrella policy - tax incentive financing
17	Subsidized structures, through a series of permits over time being ultimately improved far in excess of substantial improvement threshold...still enjoying benefit of subsidized rate.
18	Replace substantial improvement rule with another mechanism - too hard for community to track - leads to permits takeout each year - fraudulent "market value" determined based on improvement wanted
19	If rates were actuarial for <u>all</u> structures in floodplain (pre-/post-FIRM) and cost of insurance prohibited some types of development (single-family residential), what will take its place? Will there be a financial mechanism to purchase properties? Trading bad development for more bad development.
20	Eliminate/reform current rate structure to simplify rating to increase the number of properties in the flood program which would reduce the overall rates in the program. This coupled with eliminating by mitigation the RLP would bring more polices in the program again reducing rates.
21	RL Properties should be required to go to actuarial charged rates after any loss OR the 50% rules needs to be managed by other than local government therefore reducing losses by mitigating the property
22	How come do pre-FIRM structures get the subsidized rates and CRS discount?
23	If there is a subsidy, it should be means tested.
24	Communities who elect to participate in the NFIP after a flooding event and were determined to have allowed unsafe development should pay penalties, taxes, etc. No free lunch for those late to the game.
25	If policies are going to be subsidized, it should be a line item on the budget and not absorbed by NFIP.
26	The purpose of insurance is to distribute - i.e. subsidize - risk. If we want to decide on a reasonable distribution we will need a better (more specific) understanding of the process (behavioral science) by which flood insurance influences people to build in more or less vulnerable areas.
27	It's not the subsidy; it's the NFIP minimums and exclusion of levied areas.
28	It does encourage building but if eliminated would it not cause other areas of engineering in spot area of commercial interest?
29	NFIP's borrowing authority and lack of a cat load means that <u>all</u> polices are subsidized. The subsidies should be eliminated.
30	Communities need to have the NFIP available, but risky areas should pay the right rate.
31	The 2004 A.I.R. study commissioned by FEMA found a likely connection between NFIP and floodplain development. Why keep asking the question?
32	FEMA is encouraging development in flood plains behind levees and in high hazard coastal zones.
33	Effect of flood insurance availability on decision to buy/build needs to be formally established though scientific methods to be formally established through scientific methods. I believe we may find that risk communication failure is #1 reason individuals decide to buy/build in floodplain not "subsidy"
34	Base insurance on a "local and/or regional" experience pool
35	Do not change zone/preferred rate when there is a map change "until" event occurs
36	FEMA should include no build or conservation zones to maps
37	Get rid of rep. loss properties now.

Day 1 Topic 1: Subsidizing Risk	
38	Pay to Play - Cumulative SD/SI; enforce consequences (positive & negative) for development choices (move more to actuarial property tax for SFHA properties to support Local Flood Plain Management
39	Require purchase of insurance in <u>all</u> residual risk areas.
40	Don't allow sale of insurance in high hazard areas, or environmentally sensitive areas.
41	What percentage of "mandatory purchase" structures in flood plain would drop flood insurance if given the chance?
42	There would be an increase in private markets for flood insurance, because the appeal of coastal/waterfront property will continue - someone would likely step forward, but at higher cost.
43	FEMA needs to take "ownership responsibility" of what they will or won't insure.
44	If you take subsidies away, you penalize minimum wage people who are able to live near waterways.
45	Why not means test subsidies?
46	Needs to be regionally set.
47	Compare property value where NFIP-insured new development is taking place.
48	Is the need for subsidy going up or down? (50% damage applicable?) (admin grandfathering)
49	A bigger cause of development in floodplain is the elimination of disincentives for doing so, particularly disaster assistance.
50	FEMA should make its E.O. 11988 and 11990 clear and integrate floodplain management concerns into NFIP. The program is <u>far</u> too narrowly focused.
51	If NFIP withdrew from high risk areas, would it still be a financially viable program with what is left?
52	If there is too much flood damage at the 100yr standard, change the standard
53	If there are too many repetitive loss properties, stop requiring a BCA and "total" severely damaged properties
54	An alternative is to look to state for guidance
55	Local governments look to FEMA for expertise. Maps were missing no build zones.
56	Continuing to subsidize on these ancient structures.
57	Use auto insurance as example. Insure at a certain rate until there is an accident and then rates go up.
58	Need legal teeth to defend against "takings" allegations where the public good requires restricting/forbidding structural/building development
59	Properties shouldn't be penalized for being around 100 years and surviving disasters.
60	Insurance rates need to continue to take this into consideration
61	NFIP provides <u>subsidy</u> for <u>new</u> development only where - maps inaccurate - actuarial computation wrong - when map change is pending-rush to build (?) to obtain grandfather status (biggest subsidy is disaster program)
62	Since NFIP rates <u>do not</u> reflect the actuarial risk of flood damage communities are <u>not</u> given incentives to protect their floodplains
63	FEMA must increase rates but have an assistance program to assist low-income communities.
64	Allowing development in floodplains turns its back on the historic and usually more sustainable-development patterns of a community.
65	Sticks for bad development in coastal and flood zones that damage environment
66	Carrots (in private insurance companies) for buying in historic and more environmentally sustainable areas
67	Communities should be required to prohibit all government-subsidized development from mapped very high hazard areas.

Day 1 Topic 1: Subsidizing Risk	
68	Enable Coastal Barrier Resource Act to prohibit all building in high risk zones.
69	No. Absent a concrete ban on building permits, both the private markets and local policies will always enable building in desirable yet sensitive locations. The NFIP is too easy a scapegoat.
70	Do not provide federal flood insurance money in unsafe flood prone areas, this does promote bad behavior. In particular, do not provide federal flood insurance for any buildings in: V Zone Coastal A Zone and possibly all of flood plain. Floodplain is a national resource that needs to be protected.
71	Yes! NFIP insurance does promote bad behavior. - Consider what happened after Katrina. Many homeowners rebuilt to previous condition just before new flood height requirements take effect in order to qualify for low insurance rates. This put themselves, and unfortunately the taxpayers, at risk of future damage.
72	People are more worried about the development than the subsidy.
73	We have flooding in many areas that aren't flood high risk areas (i.e. rain, water main breaks)
74	NFIP take-up rates are so low it is hard to argue that the program encourages rampant development
75	Change term "subsidy" to "discount."
76	Is it time to move to reduce and then eliminate subsidy to encourage retreat from at-risk areas? (and deal with affordability through flood insurance vouchers)
77	Apply and overall payout limit for properties that have repetitive losses.
78	Barring NFIP insurance created wealthy enclaves.
79	There are legitimate "affordability" issues for some people -- but these should be addressed through non-insurance subsidies.
80	The entire coast of New Jersey was developed prior to advent of NFIP.
81	I suspect that disaster aid is a bigger problem for subsidizing risky development than NFIP.
82	Subsidized NFIP premiums encourage irrational behavior and disincentives mitigation.
83	If no insurance available - would communities abandon NFIP and repeal their floodplain management ordinances prohibiting development in floodways and restricting development in floodplain.
84	If you didn't have a subsidy, does the risk still encourage development?
85	Their risk created an environmental hazard for everyone.
86	We build near water because it's desirable. How can we tell people not to build there?
87	In <u>undeveloped</u> watershed areas pass strong legislation forbidding and governmental assistance for developed <u>and</u> create a program instead to compensate property owners for the devaluation of their land.
88	Federal government needs to buy out worst SRL properties without 100% federal funds. State/locals will not pay to remove the priority projects for NFIP.
89	Minimum standards of NFIP must be raised. 500-year for urban areas versus 100-year
90	Give no credit to levees for FPM. For development minimum standards behind levees, assume the levee gives no "protection."
91	<u>Require</u> insurance and FPM <u>behind</u> levees
92	Future conditions are a <u>must</u> for FPM.
93	Rather than reward communities for higher regulatory standards (CRS) toughen of the NFIP "minimum" standards

Day 1 Topic 2: Mapping/Risk Identification and Communication	
#	Notes/Comments
1	NFIP and mapping of levees
2	Maps based on regulatory assumptions not facts e.g. map uncertified levee as if no levee exists
3	How do we turn risk identification (mapping) into risk reduction actions?
4	Needs to map all flood risk areas, not just part
5	Everyone is at risk - it's just the degree of how much
6	Identifying risks behind decertified levees and levee like structures not just zone A
7	Maps based on flood levees tied to surge
8	FEMA and corps different {sic} in computing 100- year Q and levee break method for mapping needs resolution
9	No county left behind - map all counties
10	Support outreach efforts to property owners - mail outs, etc
11	Map residual risk behind levees
12	Go to graded system not just 100 year
13	Map accuracy related to the scientific basis of hurricane risk assessment
14	NIST developed tool that can be used to compare with results of FIRMS
15	Will FEMA be interested in reviewing the scientific basis of risk assessment?
16	Outreach to local communities on technical practical realities
17	Constant education re: NFIP/Risk/Hazards early! Adults may understand NFIP but does the young couple or single buying their first house know the pros/cons about NFIP or just the cons?
18	Leveraging resources and funds for developing modern flood mapping tools
19	No duplicate R&D
20	Need to communicate all flood risks/hazards on one map
21	Communicate with states and locals before, during and after maps are developed. Too often lack of communication leads to mistrust and misunderstanding
22	Support and encourage communities that are doing the right things
23	Bridge communication gap regarding use of maps between community compliance and regulatory compliance for lenders
24	Provide flexible flood zone designations
25	One voice from FEMA, Corps, to one community
26	Difficulty in using FEMA FP maps (zone terminology)
27	Failure to articulate "standards" versus "guidelines"
28	Needs to reflect changes on the map more efficiently (time)
29	Maps need to be "living" not static and reflect changing conditions in water shed
30	Separate insurance maps from regulatory floodplain management maps
31	One size modeling does not fit all situations
32	Alternative treatment of "working waterfronts" must be recognized and accepted
33	What constitutes an extreme flood event?
34	We need a permanent reliable source of funds to mitigate damaged historic resources (Katrina relief as model)
35	Get rid of the "bright line" show instead information about what informs risk: relv period, depth, velocity, uncertainty error bars (fuzzy lines)

Day 1 Topic 2: Mapping/Risk Identification and Communication	
36	Historical resources identification protection (we can't save it if we don't know it's there. We can't mitigate damage when we don't know what it was)
37	How to differentiate communication risk to individuals and communities
38	Needs smoothing of the adoption and release of maps. They build up in mid-august to Sept. time frame due to budget cycle causing problems with lender compliance. I.e. In 2008 my company had 11 million properties to review for lender compliance with maps released in a 45 day time-frame.
39	Too many LOMA's - eliminate them
40	Lack of good date for some areas/maps
41	New maps are inaccurate
42	No local government ability to change or amend them
43	Policy holders unhappy being remapped into higher risk area
44	Risk known and accepted by communities including premiums link
45	Provide funding so communities receive new maps can update their M:Liption plane
46	Cheap insurance communicates low risk
47	Time/resources required to modernize vs. keeping them current
48	Need to establish AL levee protection zone on DFIRMS
49	Digitization of flood maps is extremely informant and welcomed by communities that have to use these maps
50	FEMA 44 CFR 64.10 levee certification needs overhaul - complete
51	Maps need to reflect natural movement of streams defined by their natural boundaries
52	Reconstruct/Modernize/make more flexible AR and A99
53	We need a shorter process for the adoption of flood maps - 12-18 months is too long
54	How is the integration of flood maps to risk maps being planned?
55	Need to identify future conditions, erosion, subsidence, increased development, etc.
56	Streamline communication between intergovernmental affairs
57	Map risk not probabilities - feet wet, death, and loss of building...
58	Permanent location on HSIN(DHS) and/or HDDS(USGS) for digital data shape files
59	Need to replace 2% flood with higher standard
60	Need flood maps in digital format GIS shape files
61	Updates in real-time
62	Easy access to digital data (shape files)
63	Need data for whole country as well as local
64	Tie to real-time NWS/NOAA and or USGS stream-flow data
65	Tie to NOAA/NWS {sic} data and website
66	More detailed interactive mapping solutions
67	Message of risk is too complex
68	Maps only get bigger - never shrink
69	New maps = NFIP headaches
70	Need better way to work thru differences
71	Provide funding so information about flood insurance rate maps can be communication with stakeholders
72	Map habitat threatened and endangered state/federal species
73	Need for stronger support from state and federal flood plain coordinators

Day 1 Topic 2: Mapping/Risk Identification and Communication	
74	Building permits trump any other form of communicating risk, except insurance
75	Maps need to capture future potential events, sea level rise, dunes shift
76	Communications needs to do better job meeting with local media
77	Maps need to include a layer showing historical districts
78	LIDAR tends to be elevation-driven and neglects multiple returns
79	Unshared risk perception confused messages - removed consequences
80	What is the worst (floodwise) thing that can be imagined? It's not the 100 year flood.
81	New floodplain maps causing numerous LOMA's - very expensive
82	Need mapping which represents range of risks/residual risks, not 100-year in/out.
83	Identify coastal "A" zone on all NFIP maps. Educate public
84	Risk communicated through risk based insurance premiums required for ALL
85	LIDAR acquisition is not coordinated with state programs or TNM (national map)
86	Data sharing (mapping/GIS) between federal agencies
87	Make sure LOMR's are incorporated in new maps
88	Inaccurate BFE contours lines on maps(don't match detailed study)
89	Flood maps aren't using probabilistic or event based modeling approaches.
90	Best resources for schedule/release of maps changing. What's new info on maps?
91	Poor mapping to no mapping on Indian reservations impacts ability of Tribal members to own a home due to lender regulations
92	Good updated data=good maps=good political decisions sometimes. Bad data = bad maps == bade political decisions usually
93	Good mapping won't help if the interpretation and enforcement in inadequate. We need to communicate the risks AND make locals accountable
94	Simplify maps and flood zones. Less granular approach. Use 3 categories: Low/Med/High instead of alphabet soup of zone identifications
95	Mapping/Risk/Hazard - land topography, water behaviors in different situations, per building and mitigation, per community rate hazard
96	Communicate that as climate change increases, so too will flooding and the need for more information and mapping
97	Public and community officials feel new mapping is inaccurate when errors found and restudies not done. Hard to use maps to communicate risk with this scenario.
98	Could FEMA draw its maps based on expected average conditions over the maps lifetime? (e.g.: taking account of expected erosion?)
99	Need consistent message on what risk is and now it can be made understandable to local residents.
100	Communication of risk mitigation an insurance should be ongoing and occur whenever new mapping takes place
101	Stop mapping "communicating yesterdays 1%/.2% flood extent" Must incorporate scientifically defensible future conditions including climate change impacts)e.g.: over 50-100 year window)
102	Never forget the extraordinary progress introduced by NFIP and its maps. Yes they can be better but us has made progress
103	Modernized maps to be useful in climate change adoption plans
104	The whole system to too complex for the end user or local government to aid in management

Day 1 Topic 2: Mapping/Risk Identification and Communication	
105	Flood maps must show a range of varying high risk areas up to the 500-year flood zone and residual risk
106	Floodplain maps must reflect the best available science regarding flood risk including climate change science
107	Use social marketing and climate change commun/education opportunities to communicate flood risk and consequences
108	Incorporate cumulative impacts of loss/gain of natural floodplain functions in eng. Analysis; map NAT benefit functions/resources
109	Focus communication on consequences of flood possibility rather than probability
110	Eliminate nomenclature that uses 11-/500 or % and use laymen's terms - high/med/low
111	In high risk flood zones the best we can do is learn to fail better
112	WYO companies should be subject to FEMA enforcement authority beyond contract cancellations which is rarely used. Consider regular examinations, consumer complaint process, and levy of fines for non-compliance.
113	Mapping what and what for? Multi government needs in different types of mapping must be coordinated/complement into a single whole approach
114	Eliminate grandfathering as a specific future date i.e. 3 years out for residential buildings. ALL residential properties subject to flood insurance mandatory purchase after that.
115	Create a lender webpage where FEMA communities important info affecting lenders such a as flood mapping changes affecting entire communities etc. Issues of greater magnitude that affect large groups
116	Mapping generally stops at Indian Reservations boundaries and needs to include Indian lands
117	Flood maps must show residual risk areas i.e. areas what would be inundated due to levee or dam failure
118	De-couple mapping from insurance
119	Distinguish risk vs. hazard: encourage training and education to increase community engagement. Spend more time with local officials
120	Provide digital maps and infrastructure
121	Display risk to life by showing depth of velocity of possible
122	Need web-based tools to show natural hazards risks on maps of local areas and individual properties. Combine with social media and get conversation going.
123	Need to map smallest water courses - these also flood
124	More info to public after local levee is decertified: Why was it decertified and what repairs are required for recertification and at what cost?
125	Risk map needs to communicate that the NFIP is a minimum standard - not all encompassing. Locals need to go beyond the NFIP in risk identification
126	1970s=2 maps; 1980-2000s=1map; 2010 =2 maps? Confirm with locals
127	Should be doing studies on a watershed basis
128	Map coastal erosion sea-level rise zones/impact areas/residual risks areas
129	Have local communities develop more of the data
130	Much better FEMA management and oversight of flood risk assessment, especially to improve flood plain management across community and states lines
131	Convey risk to property owners outside 100-year floodplains

Day 1 Topic 2: Mapping/Risk Identification and Communication	
132	Coordinated effort with Corp of Engineers and levee managers to improve levee performance with independent accountability
133	Communicate specific savings potential on premium payments as a result of mitigation measures
134	Priority effort to map storm surge risk using NOAA SLOSH models
135	Include digital area location of key environmental resources and natural and beneficial functions values as layers with NFIP maps
136	Put the 10-year floodplain on the maps, use different regulatory requirements in it and have different flood insurance rates in it
137	What are we doing about erosion? Should we map erosions zones?
138	Digital mapping data without technology to utilize (i.e. no public GI's)
139	Adoption of maps in communities with little to no knowledge of policies
140	Identify different hazard areas using depth and velocity
141	Must do a better job of communicating that maps are scientifically depicting risk and making clear the separation between the scientific determination of risk and the policy process of drawing lines that lead to rate setting on those risk maps. Perhaps the suggestion to show grades instead of zones would help
142	Timeframe for updated maps inconsistent between communities
143	Use the data more electronically. Stop developing a lot of pre-canned stuff (profiles/tables/maps). Instead be able to develop these on the fly and as needed
144	Need better guidance on how to handle non-levee embankments in the H&H models
145	Where are the best practices from communities that have found new and innovative/effective ways to communicate mapping issues/changes/problems with the public?
146	With new technology and approaches comes an opportunity to share what works and what doesn't

Day 1 Topic 3: Mandatory Purchase/Affordability	
#	Notes/Comments
1	Mandatory purchase areas should be expanded to at least areas behind levees and below dams
2	Phase-in of how mandatory purchase areas should show full actuarial premium and show premium reductions available if mitigation steps taken
3	Affordability is an increasingly big problem. Way to address outside of insurance framework must be explored.
4	How much insurance is required - residential and non-residential? How is this amount derived?
5	Communities forced to pay full rates behind previously accredited levees (why treat floodplain as if there were no levee there?)
6	CRS discounts not being discussed with policy holders
7	DFIRM maps replacing paper maps changing areas from SFHA to floodway.
8	Federal assistance to re-certify levees - small communities cannot afford.
9	Inequality of impact on certain socio-economic groups.
10	Require all flood insurance to be mandatory and collected via property tax. Each property would be assessed based on its individual flood risk. We have the science to do this. Affordability should not be an issue in insurance and flood risk. Other programs can handle this if needed.
11	One way might be a means-tested flood insurance voucher program at HUD.

Day 1 Topic 3: Mandatory Purchase/Affordability	
12	Better - more layman term explanation of plans.
13	Simpler website.
14	When maps change, property owners not penalized until a 'payable' event takes place. More like auto!
15	Use trigger device other than mortgage loans to require flood insurance coverage. Mechanism is only partially effective because there will always be a large percentage of unencumbered properties.
16	Resolve issue of who pays for flood insurance coverage during the 45 day notice period that must be observed prior to lender force placing flood insurance. Resolution of this question benefits lender and borrower.
17	Represent areas facing mandatory insurance next summer. Trying to mitigate impact, including allowing flexibility in paying.
18	Congressman Costello has introduced HR 3415 which would prohibit insurance rate increases if levees are being rebuilt.
19	Loan officers at local banks are placed in a difficult position when mapping changes require them to contact their customers to explain a Federal requirement.
20	GROUP flood insurance behind levees. Purchased by levee district and paid through regular revenue raising mechanism (taxes, dues). This gets people insured, lowers cost, no need to individually buy, more accurate risk communication - i.e. risk (residual) exists.
21	Force placement process is a problem. Currently require 45 day notice. So a process that prevents insured from this situation.
22	Address and support how much insurance is required by mandatory purchase. Currently - replacement cost value while in many cases loss is paid on an actual cash value basis.
23	Consumers who are forced to purchase flood insurance have a difficult time appreciating the value they get for the required added expense.
24	Determine what mandatory purchase means. Currently only applies to folks with a Federally regulated loan - so expand to cover ALL properties.
25	Program is mandatory only when a Federally regulated mortgage is in place - forces the program to work to protect the lender, not the homeowner.
26	People make better choices when they are spending their own money.
27	Allow after map change a PRP (Preferred Risk Policy) to be written and remain in effect until there is a loss on the property. Don't force people that are now re-mapped into a SFHA only have the policy for a year.
28	Flood insurance must be FULL actuarial - this insurance cost must FULLY represent the flood risk - people who choose to live in a high risk area MUST pay the full cost.
29	Social programs need to be separate from safety/insurance programs - separate agency.
30	Have developers bear the costs of flood insurance (i.e. can't develop without flood insurance for whole development).
31	Tie past damage to the property to data about the dwelling so lenders know the history.
32	What system is in place to enforce the "one bite rule"?
33	NFIP premiums should be risk-based. Any subsidies should be external and transparent.
34	Consider having the community hold the flood insurance policy and then bill the property owner. The community would be the insurance retailer.
35	Require flood behind levees and dams maybe at a lower rate but make it mandatory.
36	Allow the purchase of PRP policy until first loss. After loss, apply actuarial rate based on risk.

Day 1 Topic 3: Mandatory Purchase/Affordability	
37	Do not change the mandatory purchasing requirement but find a way through need based grants, tax credits, etc. to lessen price shock.
38	Replace system-wide subsidies with income-based vouchers to individual property owners to improve actuarial soundness while also ensuring affordability.
39	Multi-peril insurance: flood, wind, hail, earthquake, etc.
40	Accountability and compliance: who is? Ramifications?
41	Make flood events and damage history public information by location and remove the privacy restriction.
42	On the topic of people at risk buying insurance, consider why people readily buy fire insurance and why people readily try not to buy flood insurance. I think the answer is who, in actuality, or in perception, bears the cost for recovery - the individual or government.
43	Consider a NFIP flood rider for areas outside the flood plain.
44	Provide phased-in premium structure for property owners with the purchase of a long-term contract for flood insurance.
45	Establish provisions for buy outs if property owner does not want to purchase flood insurance.
46	Recognize communities doing correct things by creating variable rate structures and low income supports.
47	Create affordable insurance based on community commitment and progress.
48	Develop a mechanism to better enforce the mandatory purchase requirements (work with other Federal agencies to obtain info and enforce).
49	Disaster assistance should be de-politicized and should not be preferred to an insurance solution.
50	Map and track flood damage assessments and individual assistance received by the property affected - buyer or bank can research it.
51	Require universal coverage with premiums based on actual risk - not single bar.
52	FEMA crackdown on repetitive damages - will encourage insurance purchases.
53	Require all flood insurance to be mandatory and collected via property tax. Each property would be assessed based on its individual flood risk. We have the science to do this. Affordability should not be an issue in insurance.
54	Mandatory flood insurance as mandatory health insurance and mandatory auto insurance.
55	Coordinate buy out post flood with mandatory purchase of insurance.
56	Have mandatory purchase for more risk zones.
57	Mandatory purchase not tied to a Federal mortgage. Build program that requires flood insurance on ALL properties (tied to actual risk). Perhaps collect through property tax.
58	If mandatory purchase requirement remains, make it only apply to statutory triggers. End the regulatory 'creep' requiring banks to see if flood insurance is present for loan purchases, participation, etc.
59	Subsidized flood insurance for low income persons encourages their occupying the flood plain. Also, their dislocation after a flood event is much more costly than for higher income persons.
60	Require real estate and insurance firms to collect and track prior events by property - less surprises.
61	Do more outreach before/after new maps about flood insurance and grandfathering.
62	Give building owners time and information to adjust.
63	Mandatory purchase for apartment buildings should be per unit rather than per structure.
64	Give more than one opportunity (longer time too) to grandfather pre-FIRM buildings.
65	More education to agents before/after new maps.

Day 1 Topic 3: Mandatory Purchase/Affordability	
66	Educate building owners about how simple retrofits (vents) might reduce insurance costs.
67	The mandatory requirement deployed by lenders does not produce enough policy holders and adequate spread of risk. Explore more options at local level.
68	Let community decide to subsidize - risk still there.
69	FEMA NFIP privacy rules make it impossible to map/communicate about past events/flood claims.
70	Flood insurance part of P/C insurance or homeowners insurance unless insured opts out.
71	Is there a short-term affordability issue in down economy vs. the longer term issue - address differently?
72	Loan officers should have mandatory training on determination process.
73	People pay for something that is valuable to them. If they pay and get nickel and dimes at time of loss, they will not continue to pay. Create value in the product, offer incentives (credits/discounts) when property owner improves property in flood zones.
74	Elevation for deep floodplain may not be feasible for single family; but a different land use for multi story buildings with elevation/parking/flood resistant materials may lead to affordability and resiliency.
75	Need to eliminate NFIP's 'adverse selection spiral' via broader mandatory purchase - ALL STRUCTURES
76	Can we agree that someone who owns property needs casualty insurance including flood insurance? That can help guide the discussion.
77	If someone needs fire or flood insurance and cannot afford it, they really cannot afford to live in the property - maybe society can help in affordability?
78	RCV - provide better standard for calculating RCV of properties, as is done with hazard insurance. Even if land is not included, RCV should be closer to what borrower can expect to receive at time of loss.
79	Review California DWR report on mandatory flood insurance.
80	Through education of lending institutions, make flood insurance mandatory for all structures in SFHAs.
81	People must remember/understand the relationship between NFIP as a financial program and operational emergency management.
82	Mandatory purchase is currently not enforced well. Lenders who must force place insurance may, or may not, be able to collect from borrowers. Consider new approach, like assessment upon recordation of property deed. Also include assessment for existing properties.
83	Everyone must be made to buy flood insurance. The larger the premium base, the less costly for the individual. Other insurance coverage (fire, wind, etc) are not subsidized.
84	Lenders don't care about quality of determination if it is a conservative determination. The determination companies lean towards 'in' when they lack good data. Should have a process for additional data to be submitted and mandatory reconsideration of original determination.
85	If lender does not institute review process then they should have to reimburse cost of successful 'out as shown LOMAs'
86	The system mandates too much on the local level. FEMA needs to integrate better among local officials and lenders/insurers.
87	Mandatory is such a 'dirty word' and communication on why purchase is required needs to be improved starting at a younger age - young people now don't remember a time before NFIP - we need to capitalize on that to make NFIP a conversation/process instead of a 'punishment.'
88	Develop high risk coastal and levee zones and make insurance mandatory.

Day 1 Topic 3: Mandatory Purchase/Affordability	
89	45 day notice period is confusing. Can FEMA extend expiration of NFIP policies to coincide with 45 days instead of 30 days?
90	Reasonable man test in mandatory flood insurance costs?
91	Falsely lowering price falsely lowers risk perception.
92	No comments submitted

Day 1 Topic 4: The NFIP and Environmental Issues	
#	Notes/Comments
1	Stop the bleeding! No more loss of floodplain area or function. (includes coastal areas)
2	Are there any plans to consider sea level rise and subsidence when creating FIRMs?
3	How are the "One Bite Rule" and mandatory purchase requirements enforced?
4	"One size fits all" mapping of floodplains without regard to topography or ecological function
5	FEMA's failure to account for important ecosystems values (e.g. wildlife habitat) in NFIP Administration
6	Adopt Zero-Rise Floodways, Coastal Erosion Setbacks and Sea-Level Rise No Build Zones
7	We need a discussion of overall floodplain management efforts and how these efforts link to safety as well as other (now-flood) hazmats.
8	Floodplain management impacts of flood insurance actions need to be added to be cumulative with other agency FPM impacts
9	More training for local communities on what they are supposed to be doing about T&E species areas.
10	Central bank for notice receipt of 11988 by FEMA for internet posting and FEMA analysis
11	Need to get natural floodplain functions/resources on PAR with structures via NFIP's Performance STDs, Planning, Grants, Risk Assessments, Mapping, etc
12	Federal Agencies need to make it easier for local communities to know where T&E areas are. We are doing this with flood info, why can't we include other info with the FIRMS?
13	Map Natural & Beneficial Function Areas
14	Need for NFIP's to manage actions at scale appropriate to preserving floodplain functions (watershed/landscape vs. parcel-scale with LOMC's.) (including cumulative impacts)
15	Homes (+Business) destroyed by floods wind up in landfills another reason to promote flood Mitigation
16	Failure to adequately consider or credit environmental protection and/or restoration as a risk reduction tool
17	Failure to communicate residual risk perpetuates the myth that levees prevent flooding
18	How do you encourage retrofits consistent with historic preservation standards?
19	Role of wetlands outside one discreet flood plain on another (interconnections of environment)
20	How might NFIP promote conservation of listed species and make future listings unnecessary?
21	How should NFIP ensure its compliance with the endangered species act?
22	Define Risk more broadly to include risk to environment.
23	Promotes the loss of significant cultural resources. Needs to stop!
24	NFIP diminishes Tribal Treaty rights through loss of floodplain.
25	All mitigation should prefer non-structural means and must account for eliminate change impacts.

Day 1 Topic 4: The NFIP and Environmental Issues	
26	Natural and beneficial functions of floodplains and watersheds need to be front and center but are often ignored.
27	Is there an adequate body of behavioral research to support the assertion that NFIP encourages floodplain development? - This is key to addressing ESA Relationship.
28	Risk Identification, map productions and management needs to recognize that certain industries are dependent upon close access on working within an AE/V zone, and Insurance needs to be available to them.
29	Floodplain management needs to utilize local data in map creation and place greater weight on repetitive loss or lack there of
30	How can we resolve the issue of whether the NFIP must consult with other agencies with regard to ESA
31	Incorporate climate change science in mapping and rate setting
32	Development in floodplains must be prohibited or restricted in high hazard and environmentally sensitive (i.e. endangered species habitat) areas
33	How do we balance historic preservation when the buildings are in the floodplain?
34	Need to incentivize the CRS and simplify the process (e.g. quantify benefits to communities in terms other than reduced premiums)
35	Balance flood control goals within stream flow and wetland issues
36	Courts say precluding development for environmental reason is a taking requiring local government to pay
37	Courts say precluding development for risk reduction does not require compensation (so far)
38	Is NFIP a risk reduction program or environmental program?
39	Stop allowing LOMA/LOMR way "out of floodplain"
40	Maps need to incorporate and display environmentally sensitive areas.
41	Better outreach/education to communities/impacted stakeholders on the relationship between ESA/NFIP.
42	Coordinate Flood Mitigation Plans with local storm water mgmt plans to assist communities (MS4) with compliance.
43	Develop strategies coalitions and partnerships NGO's can help.
44	Need to address all areas (build-up and open areas)
45	Need to provide risks in multiple mean-recurrence-interval (not just 100 Year and 500 – year)
46	Federal agencies need to work closer together linking multi-objective protection of floodplains safety and habitat and historic. Locals should hear one voice at one point in a given process.
47	Balance the need between environmental protection and economic visibility of communities.
48	How to streamline ESA Section 7 consultation.
49	No recognition of historic piers and wharfs withstanding decades when remapping to a V zone
50	FEMA needs to define risk to include cumulative losses associated with environment/ecological sea level rise
51	Raise "floodplain" regulations – mandatory free board and more open foundations
52	With move to digital risk maps, accommodate and encourage information layer that shows area of environmental concern.
53	Better jobs of communicating with municipal governments about FEMA's NFIP regulations regarding the protection of historic structures.
54	Encourage more floodplain avoidance – an issue that transcends NFIP

Day 1 Topic 4: The NFIP and Environmental Issues	
55	Build-in coordination with the National Park Service, National Register, State Historic Preservation Offices in identifying not just historic structures, but also cultural/archeological sites
56	Emphasis on beneficial natural functions of floodplains not just H&H's, in mapping. Habitat & Historic in many cases will overlap.
57	Need Federal Liaison/Ombudsman for NFIP communities – would help to address environmental issues with conflicting federal requirements
58	How to discourage new development in flood plains and encourage habitation of more sustainable areas (the greenest building is the one already built...not in the floodplain)
59	Minimum NFIP standards should be improved.
60	Any use of environmental criteria to support regulations will require as yet unknown legal/scientific basis.
61	Understanding what has caused increased lawsuits now vs. twenty years ago – needs to be part of the solution to be effective
62	In addressing ESA issues – need to have a balances between NFIP Goals and Environmental Goals to arrive at workable solutions
63	What are the best ways to protect historic structures in flood plains? Maybe allow the water to move through instead of board up?
64	FEMA needs to identify natural areas that protect the coastline and identify these as “no build zones” or “no damage zones” and allow for management of natural systems: dunes, coral reefs, and wetlands
65	Mitigation \$ Awards should be heavily weighted to those with best CRS rating. Then tweak CRS rating to give more benefit for environment protection.
66	Lack of integration with other Federal agencies efforts to digitize and present environmental information.
67	How to integrate historic preservation experts in determining post disaster flood damage assessments from the beginning.
68	Work with Army Corp of Engineers to steer mitigation projects from least cost to least negative impact
69	Insure development or changes to the floodway to not have long-term effects on drought conditions or become a factor in drought.
70	Coordinate with NSGS, The National Map
71	Control of development in the floodplain should be based on H&H considerations - historical and environmental considerations are incidental.
72	All federal government E/resource protections requirement should be included in fed-state-municipal land use - affecting NFIP, as well as other land use/development issues. Can Federal Mandate states and municipalities adhere?
73	Historical/municipal properties - protect/risk management, but not be NFIP insured material. Rather Gov't special protection responsibilities.
74	Massive fill brought into SFHA for large development necessitates removal of trees and wildlife without compensation.
75	EO 11988 should be implemented uniformly throughout FEMA
76	Fundamental goal of program has to change. It is an insurance loss reduction program. Much stricter minimum standards would need to be drafted to be a true environmental program.
77	Local zoning officials need to be held accountable for decision to develop in risky areas.

Day 1 Topic 4: The NFIP and Environmental Issues	
78	Study whether CRS credits (loss of premiums earned) reduce losses paid.
79	Risk Based vs. Minimum STDS are required. Everyone should be required to have.
80	Identify criteria for historic and environmental - map them mitigate and protect
81	life and property needs to be FEMA focused - other agencies at all levels exist to deal with extraneous issues
82	NFIP should better consider and integrate engineered systems and community diversity (physical)
83	More mitigation dollars needed to prevent losses
84	Federal agencies should speak with one voice and integrate policy
85	Selling flood insurance shouldn't be blamed for other's decisions to build or live in a risky area
86	No building or rebuilding in the floodway!!!
87	NFIP minimum standards = maximum standard for local government. (tightened standards)
88	How will sea level change be accounted for? (future risk)
89	Lidar should be coordinated with state program convert political units not just stream valley
90	Letter of Map Revision should initiate a conversation between FEMA/community/project. Too often project changes after community concurrence and final LOMR.
91	How will sea level change be accounted for? (future risk)
92	Stop telling people how to build in floodplain/ Don't allow LOMA's unless ground elevation higher than local/state freeboard requirements. It undermines local efforts to discourage development in floodplain.
93	Communities have "Environmental Corridors" that often contain floodplain but do not have Federal guidelines per the NFIP in regards to development which may adversely affect.
94	Is the NFIP really an insurance program? Is it a disaster recovery subsidy program? Could it morph into a planning tool for communities incorporating Departments of Interior, HUD, EPA, and Homeland Security?
95	How do you balance safety concerns and protections against future disasters with the desire/goal/ethic/public policy of retaining the historic character of your community?
96	Require public water companies to purchase floodplain easements in areas with development pressure to protect water quality.
97	FEMA should weigh in to support funding for historic property survey to state preservation offices.
98	Federal government needs to buy out and preserve priority flood and habitat areas with 100% money. State/locals will have their own priority projects.

Day 1 Topic 5: Actuarial Soundness of NFIP	
#	Notes/Comments
1	Lower the % used to determine SI or SD
2	Consider using something like the BCA program to set flood insurance rates
3	At what point is risk known, so subsidy no longer needed
4	Regarding the NFOP losses we should consider the savings to the Treasury in IRS casualties losses/disaster relief etc that NFIP payments avoided
5	Give us a list of what costs are covered by ICC rather than broad categories
6	Create "no build" zones in highest hazard areas.
7	Improve actuarial soundness by rating properties/areas by risk/flood depth and other factors

Day 1 Topic 5: Actuarial Soundness of NFIP	
8	Risk based rates generate innovation, not other way around
9	Need to keep eye to future sea level rise, etc.
10	Standard of 1% line (“in” or “out”) vs. elevation (“how high”)
11	More money for mitigation, no insurance discounts
12	FEMA does not pay for greater than 1% a.c.
13	Inventory 88-89% of structures in SFHA that don’t have flood insurance. How many of those have federally backed loans.
14	The lack of a cat load means that no rates are actuarial.
15	Balance rate structure on a state by state basis looking at payouts. Some states appear to be contributing much more than beneficiary.
16	Balance rate structures based on predicted damage vs. 85% of value or loan value
17	If we truly want to reduce/eliminate flood risk, a government NFIP must pass the full cost of insurance to the people at risk for them to fully understand the cost of that risk. If the cost is too great, they can mitigate or move. Affordability is not insurance and flood risk related.
18	The map must get to an actuarially sound basis. Insurance cost must reflect the risk to reduce risk to the nation.
19	If the program was actuarially sound you wouldn’t need it (wouldn’t need federal program).
20	Rates behind/inside levees AREA subsidized.
21	Does 1% a.c. standard provide the appropriate level of protection? TOO LOW
22	Move flood into homeowners to enlarge pool
23	Federal loans provide implicit subsidy - cost of capital
24	30-40 years building program around subsidies, need to be careful how to unwind
25	Misperceptions of NFIP goals and overall program financing
26	Eliminate subsidization for all classes
27	Mandatory purchase* should be expanded to have a better spread of risk. * May need different criteria for what mandatory purchase means.
28	Map grandfathering? Actuarial/Not Actuarial Availability/Affordability
29	FEMA's current rates may be obsolete if climate change has affected the risks. Consider doing simulation modeling of possible new risk scenarios?
30	Availability vs. Affordability
31	National vs. State/Local - political needs - affordability
32	Subsidized rates for rep loss/SRL properties
33	Enforce mandatory purchase requirements
34	Insufficient number of rates regional vs. national 10yr vs. 50yr vs. 100yr
35	In setting actuarial rates how much should be built in for unknown risk - contingency loading?
36	Making any subsidy visible in the federal budget (so debate can be had on whether there/who should have)
37	Limit subsidies to low-income policy holders?
38	Reducing subsidies for older homes offering incentives to raise or retrofit to stronger current building codes may reduce risk
39	Is there an advantage to reducing overhead to accompany actuarial rating?
40	Existing construction (Pre-FIRM)
41	Have to address the 10% cap on increasing rates (average in a year)

Day 1 Topic 5: Actuarial Soundness of NFIP	
42	Loss of Pre From Subsidies will drive the cost to disaster side of program - especially in current economy - flood insurance is not high priority when budgeting \$\$
43	Repetitive Losses Other than the SRL program what is being considered to address repetitive losses through the insurance mechanism?
44	If there is an income-based subsidy, who will determine the threshold, who will evaluate it & who will administer the discount (i.e., reduced premium to program or grant to low-income individual)?
45	Introducing a form to claim rating to bring in consumers who have lived in their home for 10+ years without a loss is a great way to create a larger pool of customers sharing the risk.
46	Non-subsidized rates may drive the cost so high people can't afford it.
47	Better enforcement of mandatory purchase requirement
48	In a perfect world 1) One rate would reflect risk/potential/nature of flooding events (not just a Katrina) per zone and class of business, i.e. structure and location and owner prevention and community adherence 2) Then where need exists overlay a government subsidy - need gauged to need with municipal and state and federal participation work off overtime withdrawn loss and federal can decrease withdrawn
49	Older housing stock more prevalent in "poorer" rural states. Elimination of Pre-FIRM subsidy will have more impact.
50	Introduce cost savings (administrative) through competition WYO's bid for "new" E-policies/online national NFIP policy. Savings in overhead reflected in lower online rates.
51	Phase out Pre-FIRM, godfather subsidies within 4 years, initiate low income vouchers increase hazard mitigation grants.
52	Link an increase in mandatory purchase requirements with a slight decrease in agent commissions. Agents would make more due to increase in volume.
53	NFIP needs to behave like a private insurance company. Everyone needs to be made to buy flood insurance. No subsidies for fire, wind, etc. insurance, are there?
54	How long? Pre-FIRM originally expected to naturally phase out. It didn't.
55	Affordability needs to be a social program.
56	Need to automatically authorize ICC for sever repetitive loss structures who what to mitigate regardless of substantial damage rule. Will decrease claims!
57	Clarify whether or not program was intended to accommodate catastrophic losses. Decide if it should be reconfigured to do so---and consider impact on premium affordability.
58	Does a cat component need to be incorporated to average annual loss year?
59	Need more vigorous implementation of SRL programs.
60	Need to revise the \$10M divided program to implement original legislative intent of a sort of discretionary program for the FEMA Administrator to deal directly with property owner when city does not wish to one have capacity to do so.
61	Diversify "100 year" risk with higher penetration of B and C Zones (500yr Zones)
62	Subsidy should be explicit, quantified discount (even pre-funded).
63	ICC consideration for group flood insurance policy
64	Incorporate reasonable future conditions, climate and level rise ratings.
65	Actuarial soundness is a priority.
66	Forgive the NFIP's current debt to eliminate costly interest payments
67	Risk based premiums that include cat probability.
68	Move perception towards discounts offered (not subsidy) for some classes

Day 1 Topic 5: Actuarial Soundness of NFIP	
69	Educate insurance agents and companies on the administration of ICC. Plenty of confusion out there, especially on RL structures.
70	Accountability coordination and accountability with Army Corps of Engineers regarding levees and other flood control structures
71	Need actuarially sound rates and uncertainty metrics based on probabilistic and event based modeling, NOT one-dimensional maps!
72	Group flood policy option for levee districts to cover properties behind levees.
73	Increase mitigation efforts a federal contribution (%) to get rid of R.L. and SRL properties.
74	Congress should capitalize the NFIP and let it operate more like an insurance company.
75	Much better flood risk assessment on flood maps, especially regarding storm surge risk
76	Hazard mitigation should always be tied to rates
77	Classification of "SRL" may have four "small" claims over 25 years. Value of structure not being considered.
78	Political feasibility of repealing subsidy.
79	Levee failure when maps and rates assume levee is good
80	Congress needs to forgive the Katrina debt
81	Consider having states set-up a flood insurance program, and have the NFIP be a re-insurer.
82	What standards [1%/.2%] are needed to satisfy mandate of reducing disaster costs?
83	Structures properly elevated affected by map modernization creates hardship financially after significant money spent to elevate
84	No mandatory purchase outside 1% flood --> Societal subsidy for flood outside
85	Set flood insurance rates at the state level
86	100yr denotation vs. full spectrum of risk

Day 1 Topic 6: Types of Hazard Insurance Available and the Level of Coverage That May Be Purchased	
#	Notes/Comments
1	NFIP should create pilot programs to encourage private provision of flood insurance.
2	Much improved risk assessment and flood risk maps.
3	Group flood policy option for levee districts for properties behind levees.
4	Expand risk pool by encouraging property owners <u>outside</u> 100 year flood plain to purchase NFIP policies by marketing coverage benefits more effectively.
5	A legislative solution needs to be established to determine - in advance- that wind/flood losses will defer to wind or flood when indistinguishable.
6	Government running an insurance program that has not kept pace with market since 1994 or before. \$250,000 limit of NFIP coverage on 1-4 family homes and multi-family buildings too low.
7	Tying required insurance amount to loan balance is wrong. Loan balance declines in time.
8	Recognize high cost areas need more coverage.
9	Need to design a new program that addresses both floods and natural catastrophes in a public/private partnership.
10	Don't federalize any market that private insurance already is handling.
11	With improved maps and a federal reinsurance capacity, the private sector could write flood insurance.

Day 1 Topic 6: Types of Hazard Insurance Available and the Level of Coverage That May Be Purchased	
12	Adding wind to NFIP is an awful idea.
13	Update NFIP coverage limits.
14	Optional NFIP endorsements (e.g. additional living expense) available for purchase.
15	Backstops: Establish backstops for catastrophic event: 1) State 2) Multi-State/Regional 3) Federal, in order to induce private sector to underwrite policies by limiting its overall exposure.
16	Widen mandatory purchase guidelines to achieve greater spread of risk.
17	Raise coverage limits for NFIP policies.
18	Adjust NFIP rates to reflect the actual risk of living on flood-prone areas.
19	Create all perils natural disaster insurance program
20	Re-address possibility of private market taking primary risk on flood with Federal backstop.
21	If private market takes primary risk, have cap on losses with Federal backstop above cap.
22	If homeowners' insurers could write flood and make a reasonable profit, they'd do it tomorrow.
23	Increase available limits (\$450,000), but charge full actuarial rates for those higher limits.
24	Find a way to include the peril of flood in property policies with a backstop for catastrophic situations.
25	Program should be oriented to protect the homeowner, not the lender. Trigger should <u>not</u> be loan secured by a federally regulated mortgage.
26	Define and modify role of private policies. Currently -- FEMA gives no support to lender/insured to determine if private policy is appropriate.
27	Make plain what type of private flood insurance is acceptable.
28	Answer whether private flood insurance is acceptable for force placement.
29	Look at the best possible steps to move from mandatory requirement to actual purchase of policy.
30	Base flood insurance on zones more generalized (blended) than the current flood maps -- which should be used by land use groups.
31	Create a dwelling form special program (optional purchase) that will protect a lender and borrower if a RCBAP is inadequate.
32	Let flood insurance be written only by private companies -- use maps for risk ID only.
33	No multi-peril.
34	Include time element coverage (offer on policy) i.e. loss of rents, business income, additional living expense. Result: less disaster assistance.
35	How can the insurance industry understand the risk so private flood insurance might be a viable strategy? This might allow for some all-hazards insurance.
36	In its present format the mandatory purchase requirements discourages a diverse risk pool due to adverse selection of risks insured and the understanding of risk by consumers is based due to the 100 year requirement. Modify mandatory purchase and if mandatory purchase is needed would we explore other conduits based lenders to drive mandatory coverage. Explore more risk based raters at property level.
37	We need a national standard to measure RISK -- risk assessment is the issue, not hazard assessment. Part of the problem is that insurance as a state/local matter but NFIP is a national program. We need to consider the <u>fabric</u> of a community; risk is multi-hazard in that context.
38	Need a way to help homeowners recover from coastal events and not be caught in "is it wind or water"?

Day 1 Topic 6: Types of Hazard Insurance Available and the Level of Coverage That May Be Purchased	
39	Should the NFIP offer a catastrophic "neighborhood" policy that serves as a community umbrella policy? This would allow for more rapid neighborhood reconstruction. The first catastrophe would provide repairs and the 2nd catastrophe would only fund buyouts.
40	Develop strategies to require flood insurance for all homes in risk area, regardless of the status of the mortgage (kind of like auto liability insurance).
41	Need higher max limits.
42	Simplify underwriting requirements -- they are too technical and require onerous documentation.
43	Clarify the standard for determining whether a private policy is comparable to a NFIP policy.
44	Allow private market to manage all floods and provide a federal reinsurance program for catastrophes (similar to the Florida Hurricane Catastrophe Fund).
45	Simplify Rating Program -- have few classes.
46	Need clear definition as to whether this is a social program or true insurance program.
47	Suggest thinking about an "all peril" property insurance contract where NFIP would retain flood risk but would act as a reinsurer to insurers on a 1st dollar basis.
48	Permit builders risk policies to be acceptable for construction loans. Perhaps create a NFIP builders risk policy.

Day 2 Topic 1: What Are the Strategies for Addressing Residual Risk?	
#	Notes/Comments
A	<i>What is residual risk?</i>
1	A high residual risk downstream of aging or poorly maintained dams.
2	Residual risk is the risk that still exists beyond the 100 year floodplain boundary or structural line of defense.
3	Discard residual risk -- provide actual risk based on level of event.
4	Risk of flooding in areas (vertical and horizontal) believed to be protected from flooding. I.e. elevated above 100 year flood and behind levees.
5	Many known flood prone areas in urban areas remain unrecognized by FEMA.
6	The risk of unintended consequences from NFIP and mapping. (Economics, Slowed Levee Improvement, Public Safety Impediments).
7	"Residual risk" is the risk that remains after something is done to reduce risk.
8	Extreme events are not well understood. Work with ACWI Subcommittee on Hydrology, Extreme Storms Task Force.
9	Residual risk -- Do not use this term. It is non-edifying. If we have to define it, it is already problematic. Find another descriptive term, i.e. community risk or actual risk.
10	False sense of security is created when we create expectation that if you protect to 100 year flood, you are OK. Use new science to describe and measure risk of flood beyond "100 year measure".
11	Residual risk also includes "issues" we do not map -- erosion, subsidence, sea level rise etc.
12	In residual risk discussion, we must first define what a flood plain is. A very bad thing in the present NFIP is the concept that a flood plain is the "100 year" only. That is <u>totally</u> wrong.
13	Risk that is close to the 100 year flood plain but not inside.
14	The term residual risk is misleading. There is a risk from flooding in all areas. We need to define the flood hazard in terms of risk for all land mass. It seems when you use a term "residual" risk or any label it suggests the risk is equal in areas included in that label.

Day 2 Topic 1: What Are the Strategies for Addressing Residual Risk?	
15	Residual flood risk is that risk that remains after application of any flood risk reduction measures. It is the probability of occurrence x consequences.
16	Residual risk is the consequences x probability of an event occurring. Residual risk should not be used. Need to define risk associated with all flood hazards.
17	The catastrophic or major events (levee breaking) that is not insured or anticipated. Don't or can't insure against them.
18	Residual risk is risk that is extreme, unusual and can be catastrophic. Insurance is for those exposures that can be anticipated; residual risk is too big; too unusual and too rare to accurately anticipate.
B	<i>What Should Residual Risk Mapping Look Like?</i>
1	Gradient lines based on event level (surge, rain fall, etc.). Work digitally -- also helps communications.
2	Show risk "contour" lines on flood maps. Emphasize the continuum of risk. It is not binary.
3	Create a potential flood area designation to all for areas at risk but not mapped.
4	Map historic events both the <u>old</u> and the <u>new</u> from media coverage and HW surveys. <u>Learn from experience</u> .
5	Map levee and dam protection zones. AL to AD?
6	Provide digital map products widely to the public. This will allow and support better analysis of risks
7	Simple, digital system that can be read, manipulated and available for libraries, schools and communities.
8	Wouldn't our environmental friends also include wetlands and habitat for and species "residual risk"? Wouldn't they want that mapped?
9	Residual risk is too narrow a term. We should think in terms of the continuum of hazard exposure from virtually no hazard to highly probable hazard exposure.
10	Convey flood risk in terms of low, medium and high. Get rid of the 100 year concept.
11	Make the current maps risk-based that can identify risks associated with specific locations.
12	Current maps can't communicate different levels of risks. Why worry about communicating residual risk.
13	Need to map <u>risk</u> by the consequence that will occur if hazard occurs. Should be done by parcel and build code standards.
14	Map and digitally present by web 10 year, 20 year, 50 year, 100 year and 500 year areas.
15	GIS - must be digital and sharable with multiple groups.
16	Has to include local data and historical damages. Is "HAZUS" a good tool?
17	Map and regulate coastal erosion zones and sea level rise zones.
18	Should we be mapping smaller watercourses and smaller watersheds?
19	If we map for residual risk, what do we do with this information since these are rare occurrences?
20	Map where residual risk events occur. Ex: where new or more frequent flooding occurs, levees fail etc.
C	<i>What are strategies for communicating Residual Risk?</i>
1	Develop inundation internet map tools linked to river stage/flood forecasts to show risk/depth/velocity for individual homes, business, structures
2	Weather Channel - make real-time information available
3	Communicate risk with one voice and through existing local government systems

Day 2 Topic 1: What Are the Strategies for Addressing Residual Risk?	
4	How do you explain to someone they need flood insurance but house across the street does not? Is there a way to more broadly apply actual risk in way that communicates "take responsibility"? Partnerships with county governments in getting message out about risk.
5	Display electronically layers of data for various parameters - erosion, subsidence, seal level rise, etc
6	Do "show and tell" on news broadcasts of potential areas
7	100% insurance requirement - premiums based on risk - true communications
8	Emphasize the fact that land use changes risks
9	New maps reflect both improved understanding and current conditions
10	Forecast new maps showing what happens if land use changes.
11	Maps on Web
12	Media events
13	Define residual risk then require outreach to the community beyond traditional mapping/town hall meetings, notices in paper.
14	Current maps make sense to us but think of your grandparents, kids, neighbors, do they understand their risk b/c at the end of the day that's what truly matters
15	Not a dumb-down map, just more widely applicable
16	Communicate risks by placing signs in flood plains stating potential flood depths. Place signs behind levees stating this is a flood plain, this areas is protected by a levee, this levee can fail or overtop, resultant flood depth would be X feet
17	Make sign requirement part of community minimum standards
18	Stop using 100 year and 500 year language - low/med/high
19	Adopt nationally the concept of "no flood risk" it is a mindset concept like the "Smokey the Bear" and forest fires. Brand/Market
20	Personalize flood risk property specific
21	Communicating should be in terms that are consequences to the structure and to the insurance industry
22	Communicate in a timeframe of mortgages (30 year/15 year, etc)
23	Communicate in terms of dollars
24	Communicate parcel by parcel
25	For large events why do we only talk about the 500 year event? What about the SPF or PMF events? Should we consider paleaohydraulic flood plains? What about 1,000/5,000 year event?
26	Communicate impacts
27	Make it real, relate to events that people connect with
28	Show, "what might happen where I live" scenarios
29	Communicate in words that people understand - remove "residual" "Risk" %17%, etc. Use terms people can understand
30	If we assume residual risk is the risk that is not guaranteed - the catastrophic even - then the mapping should reflect the different nature of the risk. Residual is not a continuum of "normal" risk. Mapping should reflect this
31	Need better clarity on the issue of most everyone has exposure to flooding. Just b/c a mandatory purchase isn't required there is still a need for flood insurance. Stress that non SPFA are still considered as being in a flood zones
D	<i>How do we implement these strategies?</i>
1	Map levee protection zones - L zones

Day 2 Topic 1: What Are the Strategies for Addressing Residual Risk?	
2	Map protection zones - D zones
3	Armor the landslide of levees
4	Leverage CRS- demonstrate real benefits, not just reduced premiums e.g.610 flood warning grade 4 - builds relationships - gets community buy-in through availability of real-time information
5	Partner with environmental advocacy groups. They share interest in controlling growth in risk areas.
6	Increase use and rewards from CRS points. Use the significantly reward correct behavior through premium reduction.
7	Use CRS points to encourage changes - do at state level to implement
8	Invest in behavioral social science targeted specifically to NFIP problems/needs rather than speculating how risk perceived in this context
9	Partner w/ CTPs, local news media, PIO's (fire, sheriff, police, EM, local elected officials - trusted sources) Need consistent message
10	For highest areas, require mandatory insurance
11	Policy - before more open to change - if current policy not working well...partnering- involve interagency approach including congressional staffers
12	Process - use internet more. Support state/local better
13	infrastructure - accept levees but make them safer and insurance mandatory behind them as federal conditions
14	Training - more federal \$\$ and less or no federal match
15	Resources - see above non-federal match really has not worked very well
16	Identify stakeholders and communication channels that are appropriate based on risk management principles. For example: lenders and local Gov't officials say they do not hear about FEMA initiatives/strategies early in the process
17	Use CTP states to start implementing trail strategies
18	Move flood plain management out of shadows and put it front and center. Call it "natural disaster risk management" and put more resources in this area. Partner with NOAA and EPA on natural disaster risk management
19	Determine area acceptable risk balance program based on this. Decision making and commitments at impact level
20	Place some of the implementation burden on the local government. The problem is really theirs so involve them in the solution.
21	Change the NFIP to an actual risk based program. Mapping tied to event levees. Premiums based on risk
22	Rethink the entire communication of risk to the consumer: Develop a consumer language to communicate risk. Find those that specialize in adult learning and those that specialize in communication strategies to the "consumer". Have a national strategy and a strategy to bring the message to the local level.
23	Go to a completely digital environment that can parcel levee information
24	Show all water hazard data (erosion, storm surge, coastal, ravines, etc)
25	Property owners should have input with mitigation efforts they have done. Cities too. Damages need to be tracked and allowed access to prior damage
26	At real estate closing notify mortgagee that they are exposed to flood risk if they are in 500 yr flood plain (if not in 100 yr flood plain)
27	CRS should include floodplain management. FEMA must include individual assistance info. Local emergency management can assist with hazard and damage assessments

Day 2 Topic 1: What Are the Strategies for Addressing Residual Risk?	
28	Have FEMA provide grants for "risk analysis" to CTP partners
29	Needs to be a focus on best practices sharing between states and communities that have developed innovative and effective communication methods - no one-size-fits-all approach but info sharing is key
30	People react to the same risk differently - FEMA needs to recognize homeostasis
31	Find way for people to want to have flood insurance rather than require it's purchase - too much bail out
32	Maps were created to rate insurance. We <i>hope</i> they are used for community development. We <i>need</i> them to communicate risk. Can one map really do all 3? How version for use?
33	Reducing residual risk requires addressing flooding, water quality, pollution, other hazards, climate changes together - not individually as done now.
34	Require insurance behind levees
35	Re-categorize the way risk is expressed for water events so we stop using years (500 yr flood) and start using something more user-friendly and understandable.
36	Expand the terminology about water loss to go beyond what most people would call flood - the image is too limiting and general interpretation is "near a body of water" and does not convey real surface water events.

Day 2 Topic 2: How Might the Federal Government Improve its Role in the Insurance Industry?	
#	Notes/Comments
A	<i>What are the strategies for FEMA to address flood insurance?</i>
1	Better Records: More accurate, accessible and easy to understand
2	More consistent and effective enforcement of the mitigation "sticks" of our "carrots and sticks" federal program.
3	Make the hazard and historical losses DATA easily available to EVERYONE.
4	Flood insurance should be part of all hazards approach/insurance policy
5	Broaden pool of insured by devising new triggers to require flood insurance: pick up properties with mortgages and those without mortgages alike. Key flood insurance requirement to property being in flood hazard area and drop added criterion of federally-related mortgage loan.
6	Rating simplification enhanced mandatory purchase low-medium-high risk defined areas
7	Data on historical losses needs to be made available to everyone to better understand risk.
8	Actuarial to better reflect risk and not speed up problem development
9	Encourage state and local risk pools (backstop? Technical assistance?)
10	Leverage insurance industry risk management expertise to develop more robust risk measures and enhanced mapping/risk identification
11	Privatize in phases. Transform into a reinsurance program
12	There must be and honest and comprehensive discussion of the private industry's willingness/capabilities in sufficiently covering the flood insurance market. (social programs through HUD etc. could always be offered later on if there was a recognized gap in coverage/affordability)
13	In order to play a role the private insurance need claims data
14	Work more closely/directly with high-risk communities to communicate both options and risk
15	Back-up local officials who are "doing it right" - consider "peer review" with substantial damages.
16	Universally require flood insurance, not just of certain people in certain areas

Day 2 Topic 2: How Might the Federal Government Improve its Role in the Insurance Industry?	
17	Much better flood plain management and risk reduction from HMGP and SRLP programs
18	Phase out residual replacing with actuarial rates 100% but do so with a phase in by criteria established now.
19	Simplify language and rating systems
20	Public awareness campaigns
21	Diversify risk by increasing non-A zone penetration
22	Re-do the entire flood insurance program to eliminate the unique definitions, limitations and regulations. Make the insurance product conform to other insurance products in the market place and simplify the rules.
23	Program needs to adopt strong risk management principles.
24	Begin to function as a private insurer would
25	Coordinate lidar collection with states and USGS to get a national lidar coverage that is consistent and regularly updated.
26	Use a minimal number of rating tiers or something similar to lessen complexities. Reduce complexity with underwriting process similar to how PRP's are done.
27	Priority on reducing flood losses: consider buy-outs of flood plain areas before disaster and look for opportunities following disasters.
28	Develop a strategy to phase out rate subsidies.
29	Better funding for state and local NFIP efforts. Kill the match requirement
30	Require insurance (at reduced cost) behind levees and for elevated properties when federal/NFIP monies are provided
31	Change the basis to something greater than the 100year flood
32	Better mitigation monies and kill BCA requirement for Rep loss properties
33	Help public recognize that everyone has some risk that must be insured. Do not tie enforcement to a federal mortgage. Consider a tie with property tax system.
34	Previously used CDBG as match or state funding as match. Now difficult to find match.
35	Develop buy at strategy at local level with public comment period.
36	Piedmont - community example of buy out
37	Floods, hurricanes, tornadoes, mudslides, earthquakes, natural disasters are a national issue, and simultaneously, a local issue. Given the increasing magnitude of these natural disaster occurrences, we must totally revise our approach to flood insurance and the NFIP: 1) Create a cabinet level agency on "Natural Disaster Preparedness and Risk Management." Move FEMA out of Homeland Security and into this new agency. 2) Create two divisions: Proactive Risk Management and Natural Disaster Relief and Response 3) Change NFIP completely to be part of a federal natural disaster program 4) The natural disaster program would have two components: Private insurance program for all to cover natural disasters with federal subsidies (mandatory for all property owners) and public insurance component that is needs based 5) Pro-Active Risk Management Division: Land use/environment, flood plain management and partnerships with NOAA and EPA.
38	FEMA must first make a decision if the NFIP is a social or insurance program. Either one requires a unique strategy if it is to be successful.
39	Seek the Holy Grail: Gather the best sociologists, psychologists, economists and others to determine what will motivate the American people to mitigate natural hazard damage and loss.
40	Information like "CARFAX" for properties - required disclosure of property damage claims by insurance companies

Day 2 Topic 2: How Might the Federal Government Improve its Role in the Insurance Industry?	
41	Social program vs. insurance program have different strategies. If social, move away from term "insurance."
42	Flooding is catastrophic and insurance companies will not step in and take on the risk or they would have by now. But insurance companies understand insurance and could help to develop a new rating/underwriting structure which would encourage the sale and participation in the program.
43	Make insurance claims available to local government. Policy holder privacy is impairing the ability to mitigate. Need access to historical data.
44	Better risk communication to public is key!
45	Require training to agents who write flood insurance.
46	Offer better assistance to communities interested in buyouts (Illinois has three man mitigation team for entire state)
47	FEMA should collect elevation data on all pre-firm rated structures. Then apply an SRL type mitigation program to worst. Then drop subsidy.
B	<i>What is the role for other government agencies with regard to flood insurance? How might we integrate the effort across multiple agencies?</i>
1	CRS (or something similar-possibly "community resiliency status" could be sued to provide better cost sharing or priority status in other federal programs.
2	Better communication between FEMA, Corps of Engineers and their regions regarding all aspects of Insurance and Remapping.
3	HUD could provide subsidies to those truly unable to afford risk-based premiums
4	Development of regional and interstate authorities to address particular flooding problems, e.g., flooding in the upper mid-west.
5	Some agencies (corps) should reform alongside NFIP, others (HUD, Interior) should make ongoing efforts. A standing board/commission should coordinate.
6	Integrate evaluation and flood maps.
7	Use local knowledge: To better access risk, to adapt program and to peer review other locals.
8	Awareness cooperation.
9	NFIP needs to be less insular, more open with and supportive of "agency" partners.
10	Accountability/coordination in determination of risk, but independent assessment of structures/levees.
11	Partner with communities to do risk assessments and incentivize actuality sound policies that mitigate risk.
12	Regular local/regional integration which feeds up to Federal
13	FEMA, local jurisdictions map hazards, track damage assessments and map them.
14	Let Insurance agencies handle insurance.
15	Better mapping of floodplains. Also, map repetitive damages and share with insurance, mortgage companies and residents/property owners.
16	1) Corps. - Levees 2) NOAA - Surge models 3) FEMA/NFIP - Better coordination with other agencies
17	State law for all states to include participation of communities in NFIP as part of comprehensive plans of communities
18	Perhaps move NFIP to Treasury?
19	Water resources development board could serve to integrate.
20	FEMA/Corps speak with one voice
21	Expand the policy holder base by requiring all properties to have flood insurance (amount and cost TBD).

Day 2 Topic 2: How Might the Federal Government Improve its Role in the Insurance Industry?	
22	Need to loop in and use Federal, state and local governments or gather info, establish program and enforce if necessary.
23	Consider reinsurance mechanism via private market or the Federal to address major catastrophes
24	Federal agencies should require specific, publically reviewed strategies for risk reduction for any community development in flood zones. These would be developed by local communities.
25	Work with USGS - The National Map (TNM) program to get a nationally consistent, current base that all communities can use (not just elevation).
26	Use capabilities of another agency to set-up means test to issue flood insurance vouchers for low income persons - even for contents insurance for renters
27	Use a better Interagency approach (FEMA, USACE, NWS, USGS, HUD, USDA/NRCS, etc. and state and local, put industry, etc. All have something to contribute.
28	Better coordination (outreach) with state insurance department.
29	Coordinate state and federal post disaster assessments - record damage the same way
30	Make sure all Federal Agencies - work together with consistent messages to locals on mitigation programs.
31	National representation from Council of Mayors or Association of local government bodies could be detailed to Federal level
32	Oklahoma: designated flood plain administrator, required training
33	Need watershed group - across local/state lines, ex. Opening dams/levees resulting in flooding in another state
34	Historic preservation program, a good model for state/local/Federal integration
35	Silver jacket corps. Program seems to have promise (Regions).
36	"Take the blinders off" - don't just think of your own program - send better unified message, work together
37	State/Federal/Local committees assessing how damage is done
38	Educate local government on flood insurance. We know when it's required but not much else. If we could understand better, we can adopt better practices or ordinances.
C	<i>If the federal government created a multi-peril insurance program, what would it look like?</i>
1	Could be similar or included in property owners insurance
2	Actuarially sound, risk pricing. Require best codes and enforcement. Hurricane/named storm coverage only if industry would not leave gaps.
3	NOTHING! It shouldn't exist.
4	In debt/insolvent.
5	This idea is a sure way to encourage development in hazardous areas!
6	Could incentive maintenance at Federal level concerned with climate change issues (wild fires), IBHS?
7	Adding insult to injury
8	Where would a Federal program for multi-peril stop and start? If multi-peril is for general purposes, there would be no need for a private insurance market. If Federal multi-peril is for catastrophic only, then you have a serious cross-subsidy if using Federal monies as a resource. Not a good idea!
9	Community participation in a multi-peril insurance program would be dependent on the community's strict adherence and enforcement of building codes developed to reduce loss
10	Cumbersome, complicated and costly. Perhaps multi-peril would be more attractive to private industry than flood alone if all hazards fell under one plan.

Day 2 Topic 2: How Might the Federal Government Improve its Role in the Insurance Industry?	
11	Federal Government can be the reinsurer backstopping a multi-peril (cat-type) insurance policy offered by private insurers. Separate premium flood for each risk depending on location of property.
12	Regional problem needs to be addressed in a regional way.
13	No multi-peril insurance. Not a taxpayer issue or responsibility.
14	No multi-peril.
15	Would require significant government or other backstop to be a viable option. It's doubtful to garner support from private market.
16	Only if adding flood to private homeowners policies, but what becomes of mitigation?
17	Homeowners, wind, flood insurance coverage's. Gaps in coverage lead to lawsuits. Maybe a reinsurance process?
18	A mess.
19	Private insurance. Work with the industry to develop a multi-peril umbrella policy that would appeal to all property owners.
20	Consider a community funded catastrophic disaster umbrella policy paid through property taxes
21	Multi-Peril shouldn't be overlaid on current NFIP. Will result in the same current issues.
22	Current market is broken with wind and flood separate homeowners would need to be able to buy hurricane coverage. Taxpayers need hurricane losses to be covered by premiums.
23	Earthquake and wind should be added.
24	Federal Government should remove itself from the flood/multi-peril insurance business and transfer to private sector.
25	NFIP is not truly an "insurance" program since in many areas the damage is inevitable. Other "perils" are NOT inevitable in the same way and so "insurance: makes more sense.
26	NFIP should be renamed as "damage deposit."
27	Make doing the "right thing" easy and not confusing - flood and wind policies should result in coverage in hurricanes - NOT DEBATABLE.
28	We want it to: pay for itself, be risk-based and actuarially prized can't be gaps in coverage
29	Maybe we need to stop calling it "insurance" instead created incentives/disincentives based on Federal policy that is applied at the state and local level.
30	A multi-peril policy will not work. FEMA does not have the resources or expertise to actuarially price it.
31	The wind hazard is much larger in terms of dollars. Such a program would increase the debt. If we can't make flood work how can multi-peril work?
32	The adverse risk pool will move from the private sector to the Federal program. With that said premiums would become unaffordable if risk based...so do subsidies live in a multi-peril program?

Day 2 Topic 3: What Are Strategies for Making Insurance Premiums More Affordable?	
#	Notes/Comments
1	Has the NFIP been successful in transferring flood risk from the general public to those at highest risk?
2	Mitigate future debt by expanding mandatory purchase to residual risk areas, by mitigating repetitive loss properties, by clarifying program not designed for the truly catastrophic losses.

Day 2 Topic 3: What Are Strategies for Making Insurance Premiums More Affordable?	
3	Long-term - actual soundness can be achieved with low rates only by: - expanding insurance of low-risk properties - reducing administrative costs - improved floodplain management - reduced coverage
4	Move to actuarial rates for insurance for accurate risk communication. Address affordability by other methods (another agency with means test capacity).
5	To reduce flood risk or eliminate it where possible, we must move the risk from the taxpayer (where it is now) to policyholders, developers, local land use authorities who make the decisions to live and build in flood plains.
6	If NFIP is privatized, how is Mitigation accomplished/ ex. I-codes flood/wind
7	Could the public assistance model requiring flood coverage for full disaster assistance be implemented for private property?
8	Any flood insurance program must address actuarial soundness first. Affordability should not be any part of a program to reduce flood risk. In regard to national debt for a NFIP, the future should have no debt.
9	"Affordability" is not the problem. Rates must reflect risk. Look at creative ways (i.e. group policies, etc) which will enhance coverage, and reduce direct impact.
10	As a publically funded model, the taxpayers are the re-insurers. They own the debt. Only way to avoid is to make NFIP a quasi-public entity which can build up and invest reserves.
11	Flood Insurance needs to be no more than Homeowners Insurance so that increased participation will help drive costs lower.
12	When considering privatization, how would catastrophic loss potential be addressed?
13	If you want actuarial rates then give the insurance program to the private industry.
14	What is the public policy mission the NFIP provides? The answer will determine the premium structure.
15	Raise the building standards - stop creating the need for continued subsidy by building to NFIP minimums
16	Possible limit to payout award
17	Redefine what types of "water" damage is payable - other water damage must be handled by homeowner's
18	Lower cost of premium
19	Property based not mortgage based
20	Do not penalize after map change - allow for purchase at old map rates until a payable event occurs
21	Take insurance middleman out of loop - make premium payable directly from municipality
22	How much is absorbed as a causality loss due to flooding? (Losses on homes without flood coverage or with limited coverage)
23	Expand pool of policy holders (all properties - require some amount of insurance) tie insurance requirement to property not person. Concept is every property owner pays something.
24	Have low, medium, and high risk categories for risk, charge appropriate rate for each, with a reinsurance arrangement for severe catastrophes, helping to subsidize the cost.
25	Increase market share to generate greater spread of risk, thereby generating more premium to improve affordability.
26	Separate rating from affordability - let rate reflect risk subsidy, be needs based.

Day 2 Topic 3: What Are Strategies for Making Insurance Premiums More Affordable?	
27	Affordable insurance subsidizes bad behavior i.e. developing in high floor risk areas
28	To reduce impact of debt give NFIP quasi-governmental role so that they can invest to get better returns, buy reinsurance, etc.
29	Affordability is a separate issue if that is a concern about some not being able to pay. Address that via a social program separate from the insurance program
30	Consistently apply requirements to meet flood damage reduction standards. Less damage results in less repair results in less cost.
31	New paradigm for flood insurance coverage: key to location in flood hazard area, drop mortgage requirement
32	Broadened pool of insured (mortgage and non-mortgage) results in larger amount of premiums
33	Greater market penetration does not improve affordability (you can't "lose money on each sale and make it up on volume"!)
34	Make requirement more universal, not just targeting certain people in certain areas (adverse selection). The broader the premium-paying base, the lower the cost to individuals.
35	Reduce cost by reducing risk. Increase mitigation programs and buyouts.
36	Diversify risk by increasing the penetration of non-A zones
37	NFIP should release all claims info to local authorities to better track substantial damage rather than trusting the locals to maintain damage records.
38	Subsidies should only be going to those that can't afford - low and moderate incomes - everyone else should be paying the true cost.
39	Address repetitive loss/SRL pricing - or develop a mandatory mitigation program for them to stay in the program as they account for over 25% of losses (as a start)
40	Raise minimum requirements rather than rewarding communities for raising their own. This sends wrong message
41	Make flood insurance more affordable and/or reduce future need of borrowing by denying insurance to repetitive losses when they refuse mitigation.
42	Mitigation - based on good science
43	Affordability is a social, not an actuarial concept. Therefore, subsidies should not be baked into NFIP premiums.
44	Expand direct policies through ebusiness internet sales. Savings should be reflected in lower cost for these online flood policies.
45	Writing flood insurance cannot be automated - complex product
46	Wider spread of risk by making more zones applicable to mandatory purchase.
47	Start with recognizing current flood policy best serves catastrophic losses and doesn't make sense for low risk properties. Economic conditions need to be taken into account in strategies - no longer "being poor" is not our problem.
48	Could coverage in SFHA be mandated as part of local property tax payment?
49	Include time elements coverages, i.e. loss of rents, business income, and additional living expense as well as increased limits for building and contents.
50	Better information to allow more accurate risk modeling in combination with pro-active risk reduction through building codes and disaster resistant structures. Result: cost would be more consistent with risk

Day 2 Topic 3: What Are Strategies for Making Insurance Premiums More Affordable?	
51	Simplify the rating and underwriting of the flood policy which enables better understanding of the policy. This leads to more sales in low-moderate risk areas. Simplifying could mean total revamp to a call rate basis of low, moderate, high risk rates.
52	Allow funds and premiums collected to be invested in non-flood years to build surplus funds.
53	Can rating be expanded beyond structure - special parameters - such as distance to water, basin?
54	Enforcement of loss, mitigation for repetitive loss and SRL properties
55	Policies written on structures in approximate "A" zones and pre-firm structure policies can be made more affordable by obtaining elevation data. Policy holders need this information.
56	If policies are sold at true risk value, increasing policy volume at best does no harm, at worst magnifies the problem
57	Examine complete implementation and enforcement off compliance requirements
58	True insurance programs have reinsurance. Social programs are meant to be subsidized. If rates are not subsidized, then a government program must be available to help low income
59	Raise the bar on building codes and other regulatory tools. But, allow incentives like LID (green infrastructure) to reduce premiums
60	Allow loss free properties to purchase low-cost preferred risk policies regardless of zone then bump up after a claim - desire is to increase pool of customers sharing risk
61	Broaden the pool by dropping the mortgage link.
62	End concept of residual risk. Communicate to all residents that they face some risk that must be insured.
63	All pay for flood insurance through property taxes (not mortgage), with premium based on risk (mapped floodplain) increases pool, actuarial rates should apply, this should help address affordability with more participation
64	The higher the risk the higher the insurance. Change behavior.
65	Set rates based on risk. Someone likely to get 6" of water should not pay the same rats as someone likely to get 6' of water.
66	Balance rates on a state by state basis or allow CRS program based on state minimum standards if localities have to adopt.
67	Need variety of ideas to address "adverse selection spiral" - including decoupling purchase required from fed-backed mortgages
68	Need to reexamine what "actuarial" means? Use of average loss year vs. another basis.
69	Regardless of what premium is eventually paid, need to make full hazard information, loss history and full "actuarial" premium known for every property - public record (known early in real estate transaction process)
70	Offer package discounts for purchasing hazard and flood (or other insurance) from same company.
71	Escrow for flood insurance premiums just like for hazard. Offer discounts for annual renewals (clear claim history, etc.)
72	Tie flood insurance requirement to property ownership
73	Implications to affordability beyond premium (property value, appraisal)
74	Discount for property-specific measures that benefit the basin such as runoff capture
75	Consideration of climate impacts in loss modeling (implications that consider future conditions that vary from past experience)
76	Pricing - must spread the risk to make more affordable. Think of tying rates to wider risk pools.
77	Incorporate future catastrophic events into flood hazard modeling.

Day 2 Topic 4: What Are the Next Steps With Regard to Land Use and Environmental Management? Now That Communities Understand Land Use, How Do We Equip Them to be More Productive?	
#	Notes/Comments
A	<i>What are some new options for the federal government role in land use in the flood plain?</i>
1	Identify coastal "A" zone. Recommend local zoning laws. Keep all future development out of "V" and coastal "A" zones
2	Partnerships with communities to incorporate and accurately reflect local data/knowledge
3	Better partnering with municipalities - those that know their community and the impacts of flooding. One size does not fit all.
4	Require comprehensive floodplain management plans for community participation; provide funding support from federal level - integrate with Hazard Mitigation planning - "Water Resources"/ Watershed level Plans
5	FEMA should stop asking whether NFIP induces flood-plain development and open objective processes (i.e. ESA and NEPA) to assess impacts of this development and its environmental impacts.
6	Watershed management vs. community: ex look at larger picture intergovernmental USDA - FEMA - EPA - Energy
7	Reestablish the Interagency mechanism and develop the Unified National Program for Floodplain Management (UNPFM) to coordinate FPM among all agencies in a living program
8	Mandate a "risk" statement within local LVC for zoning within the flood plain
9	Reestablish US Water Resources Council with cabinet-level support and focus on floodplain management as a key first activity
10	Coordinate Natural Resources Conservation Planning with NFIP Flood Risk Planning
11	Corner disconnect between land use and Hazard Mitigation
12	Require NFIP communities to develop a comprehensive plan for development and protection of floodplains.
13	Think broadly - watershed - cumulative impacts - water resources. Think how to make good water resource management easy by locals. Take federal "blindness" off
14	That there be a coordinated administrative structure - not an ad hoc one - among DHS/FEMA - HUD - Interior addressing FMP
15	No adverse impact. A. Think water resources - water quality - water quantity groundwater. B. Protect taxpayers from externalized costs to fed taxpayer. C. Think watershed not just SFHA. D. Pull concepts together for ease of local implementation.
16	Coordinate at federal level to make local enforcement much easier
17	Feds facilitate locals doing the right thing for good land use not just flood plain management
18	Create a common terms/message that does not focus on flood risk alone. One that captures all long-term benefits and risks together.
19	Active role in growing natural vegetation in water and land.
20	The Federal Government should not dictate floodplain management to localities, but should: - communicate risk directly through community partners - incentivize good behavior
21	Recognize externality (benefits to locals; costs to Feds) are a huge challenge for local folks doing the right thing. We need to change incentives
22	FEMA/HUD should incentivize habitation rehabilitation of older and existing buildings and communities that are both more structurally resilient and in less sensitive/risk-ridden areas
23	Federal role is insurance. Areas (water shed, community, etc) should be responsible for acceptable risk. Feds provide guidelines and audits only. Insurance premiums risk based

Day 2 Topic 3: What Are Strategies for Making Insurance Premiums More Affordable?	
24	Recognize that local governments never win a takings case. They always cost money, time and political capital.
25	Regional peer review (meaning community/local) use CRS to reward good land use
26	Use a "water shed" approach to reducing flood risk and reward communities by lowering insurance rate ex. reconnect rivers with floodplains to reduce flood heights and sediment loads. Plan to break Ag levees (downside of river bend) when flood occur. Vermont is doing something like this to lower recovery costs.
27	Incentivize communities and provide better oversight. Locals are not trained well - work with them to do a better job to do risk analyses/ mitigation for all hazards.
28	Have Feds set national standards which are tweaked and modified regionally on a watershed basis - then enforced locally with incentives
29	Federal Government needs to incentivize/reward sound local land use planning
30	Federal Government needs to help share local successes in land use planning and zoning with others and economics
31	Need to be able to buy out property post flood with the same speed as say levee repairs. Offer buyouts within 90 days max
32	Include floodplain management into CRS. Need local input for historical damages, etc
33	Federal Government should provide oversight of comprehensive flood plan by floodplain management peers at state/local level
34	Encourage/require LID development so as not to make flood heights/velocity worse; as well as degrade water quality
35	Rewards for good behavior beyond CRS insurance reduction to policy holders to reward to incentivize commonalities from disaster cost share; better deals on all Federal programs EPA - NRDC - HUD - USDA - more
36	Coordinate with state/local officials to...Buy-outs within 90 days after a flood (takes too long to buy out)
37	Basin-wide approach to mapping which includes looking at "future conditions" will indirectly affect local land use decisions while also enhancing flood plain management goals.
38	Make buyouts the only force of disaster assistance for coastal high hazard areas.
39	Federal Government as things presently exist, needs a larger role in local land use. Now the Fed provides the funds for flood response, recovery and rebuild but the local government decides the land use. Fed role should be larger if locals take funds for the 3 R's.
B	<i>How can we (FEMA) improve the minimum criteria for FPM?</i>
1	Work with coastal states to identify sea-level rise zones based on basic scientific consensus
2	Increase the minimum standards. Also incorporate "natural and beneficial functions" into Flood Plain Management. The[y] are one and the same.
3	Require A. Freeboard (min 1ft). B. De-emphasize how to "get out" of flood zone. C. Emphasize that new development can have no impact on existing development
4	Raise minimum standards. Mandate states support local government
5	FEMA needs to take into account and balance economic/community sustainability in mapping
6	Severely discourage use of fill throughout the watershed

Day 2 Topic 3: What Are Strategies for Making Insurance Premiums More Affordable?	
7	BFE's increase over time due to longer gage records, more data, development etc. Therefore it's time to increase FEMA's minimum standards to account. The new BFE should be 100 year and 1' foot freeboard. - NAI - LID
8	Like fire insurance rate communities individually on ability to control flood risk - tie in with cost sharing for various federal benefit programs/use sliding scales
9	Require minimum 3' Freeboard in Flood Plain (this takes into consideration future scenarios such as sea level rise)
10	Move to natural/zero-rise floodway, with incentives for watershed-level floodwater management ("hold water on land concept")
11	Recognize that minimum FPM of today are based on 1950s and 1960s science and engineers. - Think cumulative impacts - life safety
12	Stop the bleeding. Prohibitions on construction in most hazardous zones (erosion zones, floodways, etc)
13	Include standards for minimizing impervious surface in upland areas (LID)
14	Re-visit the criteria for determining which structures qualify as historic. Use "best practices" that work in communities.
15	As a starting point, require V zone construction standards in coastal A zones, including prohibition of fill to elevate structures.
16	CRS rewards to community (financial)
17	Get away from prescriptive quantum approach - use range or tiered approach, not B/W. Incorporate climate change data!
18	Change in minimum criteria for FPM requires major rulemaking. (Overdue - it's been over 20 years?) - Trigger full EIS process. Incorporate climate change.
19	Criteria should be guidelines. Areas establish acceptable risk, with knowledge of impacts on property, safety premiums (risk-based), etc. Identified by Feds.
20	Improve credibility of maps. Develop insurance vs. and regulatory vs.
21	Think community resiliency and incentives.
22	Pay for it. Many rural communities do not have people with the training or expertise to adequately manage the program. They cannot afford to pay someone with such training and expertise. Wage structures would not permit it in many cases.
23	Clearly link FPM criteria to other Hazards (wild fire etc) and water quality.
24	CRS modified to require habitat preservation and restoration, development policies that protect and do not destroy or degrade floodplain functions and policies that work to eliminate harmful levee construction and filling practices.
25	Use building code process more to raise minimum standards. Local government would enforce.
26	Base minimum FPM criteria on best available data not only the FIRM.
27	Consider what special measures/assistance is needed for tribal communities
28	Enforce the current CFR consequences for violating minimum standards for NFIP participation.

Day 2 Topic 3: What Are Strategies for Making Insurance Premiums More Affordable?	
C	<i>How do we (FEMA) take into account natural functions within the NFIP (Mapping, Insurance, Flood Grants)?</i>
1	Move away from “one size fits all” mapping and account for topographical and/or regional differences in flood dynamics
2	Recognize that if we “stop the bleeding” as Doug Whitman from EPA said, we can protect natural values by at the same time protecting people and property – think cumulative impacts
3	Use the emerging FWS IPaC system as a tool to avoid adverse effects to endangered species.
4	Natural functions – instead of mentioning by reference in regulations – specific measures/performance standards should now be the minimum NFIP requirements. – Setbacks from stream banks – minimum % SFHA preserved as Open space/ Natural areas
5	Map natural beneficial systems and allow for future movement and identify these areas as protected no-build, no-auto zones. Work with other government agencies that have already mapped these – fish and wildlife etc
6	Within “FEMA Flood Plain” study report reflect natural functions
7	Make maps GIS based to take advantage of geospatial analytical capabilities
8	Develop Natural and beneficial functions map layers to support planning/public policy decision making
9	As FEMA pursues this, lean on their Federal partners and their expertise in identifying and managing natural resources (e.g. EPA, FEWS, NOAA). Lots of lessons learned (and healed wounds to prove it!)
10	Provide grants and other incentives for communities to incorporate and promote green infrastructure (LID techniques)
11	Mapping vital features/functions in watershed (not just administrative Floodplain) is necessary first step, but not sufficient. Mapping should consider future condition due to climate change.
12	Coordinate buy-out with NFIP post flood
13	Training on how to use dFIRMS in GIS especially for small cities
14	Dramatically increase financial incentives (benefits in because analysis) for green infrastructure projects in Mitigation grants (including post-disaster recovery funding)
15	Make buy-outs in floodplain even easier, especially if community has a comprehensive floodplain restoration plan
16	By calling NFIP “insurance” it provides a false sense of security and entitlement for a public that does not have a good understanding of natural and environmental patterns.
17	Include the benefits of natural functions in benefit cost analysis. Also include the loss of benefits if that is what happens for a proposed project
18	Mapping should be graduated based on event levels (storm surge, rainfall, etc.). Impact on historical, environment, etc. Is not the responsibility (and should not be) of the NFIP. Other governmental entities for that.
19	Provide incentives across natural hazard (NFIP) flood, water quality, wildlife management etc to encourage protection of natural functions i.e. address more than one problem at a time – not just flooding
20	FEMA should remove incentives to communities for constructing new levees
21	Consistently apply CRS standards for natural benefits

Day 2 Topic 3: What Are Strategies for Making Insurance Premiums More Affordable?	
22	Projects that reduce risk by protecting floodplain should be rewarded with grants and other assistance
23	FEMA should remove incentives to communities for constructing new levees
24	Can you require homeowners to pay for parks/wetland acquisition as part of insurance premiums? Legally? Politically?
25	FEMA needs to identify amount of water Floodplain should be able to hold during a 100 year flood, then not allow structures in future to displace that water.
26	Make coastal wetland restoration a higher priority. More buyouts after disasters.
27	Communities should be given option to request that FEMA reflect natural/beneficial features of floodplain in maps (i.e. dunes, wetlands, habitat, aquifer recharge areas etc.)

Day 2 Topic 5: How Do You Relate Mapping, Building Practices and Insurance?		
#	Notes/Comments	Scenario/Focus
1	Mapping is essential to hazard identification for purposes of insurance.	Mapping + Insurance
2	The hazard needs to be expressed in terms of risk.	Mapping + Insurance
3	Need more granular data at the parcel level for insurance and risk identification	Mapping + Insurance
4	From a parcel based system additional hazards could be indentified	Mapping + Insurance
5	Eliminate mandatory purchase of flood insurance	Mapping + Insurance
6	When maps change from low risk to high risk, provide more education on why the maps have changed; impact of the change and allow greater time for the insured now in a SFHA to retain the PRP - if they haven't had a claim.	Mapping + Insurance
7	You need accurate and timely mapping to have fair insurance. This requires a nationwide, consistent mapping effort (e.g. the national map) and high quality data (e.g. lidar) which shows elevation, vegetation, and structures.	Mapping + Insurance
8	A priority should be made of mapping historic structures and contributing structures in historic districts for better response.	Mapping + Insurance
9	Mapping is essential to identify hazards and they need to identify the degree of risk. This data is used to develop the insurance programs and used at the community level for planning/mitigation etc.	Mapping + Insurance
10	We must find effective communication strategy to the consumer. We must communicate the degree of risk...we talk in terms of hazard. Understanding risk by consumer is essential if the NFIP policy base will grow on a voluntary basis. Growth and adequate spread of risk cannot be achieved through mandatory purchase.	Mapping + Insurance
11	Mapping is cornerstone to defining insurance ratings.	Mapping + Insurance
12	FEMA must define residual/graduated hazard information, not just the 100 and 500 year, but by structure or contour. Must go digital for display.	Mapping + Insurance

Day 2 Topic 5: How Do You Relate Mapping, Building Practices and Insurance?		
13	Floodplain maps should address floodplains at current and built out boundaries - anticipate growth. As growth occurs, require flood insurance for structures in expanded floodplain.	Mapping + Insurance
14	Maps must be accurate and up to date if tied to insurance.	Mapping + Insurance
15	Real time digital access to maps.	Mapping + Insurance
16	Make mapping process more regular and predictable. This will keep local governments/levee districts more responsible/involved and Federal government better prepared to communicate. Process now seen as punitive.	Mapping + Insurance
17	Only if insurance becomes mandatory at same rate for all. Otherwise maps are needed to show risk.	Mapping + Insurance
18	Need to develop a simpler map system for all to use, without needing an engineer.	Mapping + Insurance
19	Mapping needs to show graduated risks to capture all, not just the 100 year risk.	Mapping + Insurance
20	Faster at adopting new maps	Mapping + Insurance
21	Easier to improve maps	Mapping + Insurance
22	More articulate at level of risk.	Mapping + Insurance
23	Insurance should be mandatory	Mapping + Insurance
24	Those who don't get it will receive NO disaster assistance.	Mapping + Insurance
25	Need TWO mapping products: one for consumers, one for policy makers.	Mapping + Insurance
26	Insurance industry should encourage flood insurance outside mapped zones. Must be affordable!	Mapping + Insurance
27	Insurance rates should be able to look up a building insurance rate similar to seeing past taxes.	Mapping + Insurance
28	Mapping, building practices, and insurance should all be balanced by risk. Feds measure the risk and the program (premiums, etc.) follow.	Mapping + Insurance
29	Get away from the message of mandatory purchase and instead communicate about protecting your investment. People want to feel like they are buying something of value. Sell the value.	Mapping + Insurance
30	Illustrate degrees of risk/hazard rather than am I in or out? (low, medium, high)	Mapping + Insurance
31	FEMA should work to incentivize rehabilitation and rehabilitation of historic and existing and less environmentally sensitive areas	Insurance + Building Practices
32	Consistent definition between insurance and building codes (e.g. crawlspace)	Insurance + Building Practices
33	There should be incentives in NFIP for homeowners to build 'code plus' and retrofit existing homes.	Insurance + Building Practices
34	Better coordination between insurance pricing and floodplain management, i.e. just because a structure is 'built in compliance' doesn't mean the pricing/insurance will be inexpensive. As an example flood plain management may accept negative elevations to build a structure but insurance will be expensive.	Insurance + Building Practices

Day 2 Topic 5: How Do You Relate Mapping, Building Practices and Insurance?		
35	Insurance pertains to the flood risk	Insurance + Building Practices
36	Building practices reduce or prevent the risk and lower insurance costs	Insurance + Building Practices
37	Mapping shows the risk	Insurance + Building Practices
38	These interrelated/interact	Insurance + Building Practices
39	Use building practices for adjusting individual rates	Insurance + Building Practices
40	Insurance industry should attempt to reward use of better construction practices. This may be difficult in light of existing homes and lack of information about how homes are built (insurance firms know very little about the homes they insure)	Insurance + Building Practices
41	Government should not insure people who insist on living in high risk areas (fire, flood, earthquake, etc.)	Insurance + Building Practices
42	Tie flood insurance to the dwelling, not the homeowner	Insurance + Building Practices
43	Decoupling of maps would be confusing to local officials	Insurance + Building Practices
44	Need to discuss insurance early in design/build process.	Insurance + Building Practices
45	Link flood-safe to 'green' for LEED?	Insurance + Building Practices
46	As preliminary DFIRMs are released, there appears to be a scramble to start projects in areas that will change designation, especially SFHA to floodway. There needs to be strict policy rather than trusting local authorities to avoid these types of development.	Mapping + Building Practices
47	Floodplain, wetland, soil, NHD. Mapping should be layered that can be displayed together to site buildings appropriately.	Mapping + Building Practices
48	FEMA should work more closely with state and local officials to enact and enforce stronger building codes (elevation) in flood mapped zones.	Mapping + Building Practices
49	Strict liability mitigation needed to release engineers to perform compliance determinations and assist in acceptable risk decisions.	Mapping + Building Practices
50	Maps are essential to the building practices associated with flood insurance.	Mapping + Building Practices
51	Include community infrastructure as part of the building practices (i.e. it may be ok to build a dwelling to appropriate height but what is the impact to get water, sewer, electricity, etc. to the dwelling?)	Mapping + Building Practices
52	Feds should provide guidelines and assist in audits. Acceptable risk decisions should be at lowest level (watershed, community, etc). Risk based premiums would focus.	Mapping + Building Practices

Day 2 Topic 5: How Do You Relate Mapping, Building Practices and Insurance?		
53	Mapping - building link is critical. Building codes need to be improved to reflect known hazards. We need to allow performance designs that will satisfy site/location criteria for multiple hazards. We do it for earthquake why not better wind, flood, hail, wildfire, etc.?	Mapping + Building Practices
54	Codes (building/zoning) need to be better coordinated and linked	Mapping + Building Practices
55	Strengthen links between building codes and floodplain management best practices	Mapping + Building Practices
56	Link mapping to damage assessment to mitigation and building practices.	Mapping + Building Practices
57	History of the dwelling must be available to all parties in any transactions.	Mapping + Bldg Practices + Insurance
58	Approximate A zones needs new publication on building 'reasonably safe from flood' that includes info on how this will affect cost of flood insurance.	Mapping + Bldg Practices + Insurance
59	Accountable	Mapping + Bldg Practices + Insurance
60	Separate program from policy	Mapping + Bldg Practices + Insurance
61	FEMA should move aggressively, in coordination with partners, to define risk (hazard, probability x vulnerability x consequences).	Mapping + Bldg Practices + Insurance
62	Risk is the backbone to insurance rating. Building structure/practices are defined by risk as well. FEMA should collect structural information (parcel) in coordination with community and insurance industry.	Mapping + Bldg Practices + Insurance
63	There needs to be a better understanding of what the 'maps' are for. Flood insurance rating tool.	Mapping + Bldg Practices + Insurance
64	This combination encourages people to build to the minimum standards allowable.	Mapping + Bldg Practices + Insurance
65	Communication with public is a huge barrier to public understanding.	Mapping + Bldg Practices + Insurance
66	Language needs to be used that makes information about risk, choices, and degrees of risk, what level of protection they really have.	Mapping + Bldg Practices + Insurance
67	Structures are being elevated using ICC techniques, then maps change and these mitigated structures fall back into higher insurance rate categories due to the new designation leading towards resentment of local officials.	Mapping + Bldg Practices + Insurance
68	Maps - zoning - insurance should be connected. There is a nexus.	Mapping + Bldg Practices + Insurance
69	Building practices and insurance should be adjusted in accordance to risks. Therefore: maps should be risk-based (i.e. based on scientifically sound probabilities); maps should provide site-specific risk information (not just area of 100 year flood)	Mapping + Bldg Practices + Insurance
70	Producing digital maps widely will allow NGOs and academics to do modeling; will allow better decisions	Mapping + Bldg Practices + Insurance



Day 2 Topic 5: How Do You Relate Mapping, Building Practices and Insurance?		
71	Simplify message to performance desired! Too fragmented now. What is FEMA's goal? Maps, insurance, building practices are all components, not the end.	Mapping + Bldg Practices + Insurance
72	Go to community rating - offer site specific reductions for proof of lowering risk.	Mapping + Bldg Practices + Insurance
73	Why is there reticence to make maximum use of every tool in the toolbox?	Mapping + Bldg Practices + Insurance
74	There should be 'no build' areas	Mapping + Bldg Practices + Insurance
75	Dynamic maps made available to architects, community planners, insurance companies and property buyers.	Mapping + Bldg Practices + Insurance
76	Property buyers given incentive to purchase resilient buildings.	Mapping + Bldg Practices + Insurance
77	Be cautious of strategies to make historical loss data public - could have unintended consequences of misleading sense of safety under changing environmental conditions.	Mapping + Bldg Practices + Insurance
78	Are all really necessary to function on a risk basis, but all can be improved.	Mapping + Bldg Practices + Insurance
79	Flood insurance - reality vs. mandate	Mapping + Bldg Practices + Insurance
80	Big problem is using map generated for insurance rating purposes to meet all our needs for risk identification, risk communication, risk-wise/risk-informed decisions, including building practices/land use. 'convenience' of one map is inhibiting this.	Mapping + Bldg Practices + Insurance
81	A model exists with SLOSH/surge maps that homeowners know the risk if they build in surge zones. The homeowner 'owns' the risk.	Mapping + Bldg Practices + Insurance
82	Better coordination of all the plans/maps: land use/zoning; flood insurance/risk; hazard mitigation; historic resources; watershed; endangered species, etc. etc.	Mapping + Bldg Practices + Insurance

Overall Notecard Comments	
#	Notes/Comments
1	Require insurance companies to include "flood" for every policy, regardless of location with rates based on elevation above BFE. Minimum cost about \$100 a year.
2	Make FEMA a Cabinet level agency, move out of DHS.
3	Move Mitigation Planning and programs to HUD - Community Development (away from emergency management).
4	Stop making education a 5% set-aside. It's more important than that.
5	Simplify underwriting and rating of flood insurance.
6	Change 100/500 year to low, moderate high risk and develop class rating.
7	Force mitigation on RL and SRL properties. If rejected make them 1316 properties with no grant/loan eligibility or mandate full actuarial rates.

Overall Notecard Comments	
8	Need to make maps risk-based that show multiple levels of risk for specific locations. There are tools that have been developed for this purpose (NIST, NOAA).
9	Need to adjust insurance based on risk levels, not just "yes" or "no" for being inside or outside of the 100-year flood zone.
10	Remember that a flood designation impacts property values.
11	Many local governments don't have the personnel to administer programs effectively.
12	If programs are not managed locally they will not be accepted locally.
13	The nation needs FEMA's leadership on climate adaptation and hazard mitigation. Get on climate train - it affects all 3 "legs" of NFIP.
15	Mapping - need to map tomorrow's flood hazards, not yesterdays
16	Mitigation opportunities to plan better and avoid/mitigate impacts; need to consider and target acquisitions based on where water/ecosystems can be scientifically predicted to be in 50-100 years, not just where they are today.
17	FEMA's Hazard Mitigation mandates/mission and relationships with state/locals are critical to building national resilience to weather and climate hazards.
18	Expand efforts to identify and incorporate ecosystem services/national resources in all aspects of NFIP and disaster recovery. Programs need better tools to quantify these services and enable their consideration alongside building infrastructure damages (e.g. HAZUS)
19	Decouple flood hazard data from insurance purchase requirement - don't rely on one map to implement all elements of NFIP (risk comms and risk reduction)
20	Expand participation - eliminate link to federal mortgages.
21	Rebuild/modernize/make more flexible A99/AR Flood Zones
22	Simplify rating and underwriting
23	Expand market share for a broader spread of risk and generate additional premium, especially in lower risk areas.
24	Provide more legislative support for litigation exposure resulting from claims handling issues
25	Separate from DHS, should be stand-alone or part of another more relevant area
26	Flood - Risk Analysis grants for local communities
27	Levees - Re-examine and re-write 44CFR65.10
28	Recovery needs to transition immediately to resilience. NFIP needs to be the vehicle to make that happen (insurance and mitigation)
29	Communicate using words and terms the public can understand
30	Integrate NFIP and flood programs with water quality, wild life, etc to address root problems that create problems for flooding, pollution, species extinction etc.
31	Create incentives to address problems on a regional and/or watershed scale - upstream and downstream, reconnect rivers with floodplains to reduce flood heights and reward communities by reducing insurance rates
32	NFIP should adopt stronger risk management principles with buy-ins by local communities
33	More coordination between NFIP and Disaster assistance to avoid undermining of NFIP goals.
34	Hold more "listening sessions" at Regional level.
35	NFIP should commission a mapping and risk identification project with scientists and risk management organizations that have had success in other perils like hurricane, tornado/hail and earthquakes.
36	Use a graduated risk basis, not just the 100 year flood.

Overall Notecard Comments	
37	Increase NFIP funding at state and local level and kill the non-Federal match.
38	Increase mitigation funding and kill the BCA requirement for repetitive loss buy-outs.
39	Kill the non-Federal match for flood buy-outs.
40	Create flood inundation tool to improve communications and outreach. Tie it to NWS flood stage/ forecasts.
41	Administrator Fugate's question - should the listening sessions go "on the road" - yes please!!
42	What are the ways to do NFIP? To base NFIP on risk as defined by consequences and not just hazard identification.
43	Display, educate and manage structural and land use management on the risk. Display by parcel.
44	Have FEMA map and educate; turn over the insuring to the private sector.
45	Completely digital with overall risk based on all flood hazard risks - the other hazards such as dams, erosion, etc.
46	Communicate risk in terms of home owner interests - period of mortgage, etc.
47	Establish stakeholder committee to receive input, feedback and coordination.
48	Remove the 100 and 500 year mandatory requirement. All structures pay graduate risk insurance commensurate to risk.
49	Incentives states and local government with CRS
50	Map the hazard as a baseline
51	Use rating by community (default) with option for site-specific rating on showing reduced risk.
52	Raise amount states must "cover" in disaster losses so they have greater incentive to ensure proper building and insurance.
53	Value talking to communities. More regional approach will reduce travel time, increase participation. Emphasis on talking to communities. We have to reeducate - teach us ask not insurance companies and FEMA Directors.
54	Website feedback - let us review comments in addition to providing additional comments.
55	Mandatory insurance with risk based premiums.
56	Mapping with graduated risk markings, based on event levels.
57	Risk acceptance by local area (watershed, community, etc.) with federal guidelines and audit assistance.
58	Social issues by other agencies (HUD).
59	Rate every community like you do in CRS. CAV's should be more like CRS audits.
60	Set flood insurance rates at the state level.
61	Cost - presently too expansive - more than 2x cost of homeowner's insurance for most.
62	Do not penalize with higher rates after map changes.
63	Take Director Fugate's message on the road. We can help!
64	Downplay or abandon 100 year standard and base regulations and rates on levels of risk along the entire flood hazard continuum.
65	Create quasi-public body to administer NFIP with ability to invest proceeds, purchase re-insurance, set actuarial rates, etc.
66	Address the conflicts with conflicting goals of flood insurance and disaster relief (you need a two day listening session on this topic).
67	Have more listening sessions at the regional level.
68	FEMA. Work with other government agencies to map natural protective features such as dunes, wetlands, ecosystems and show on NFIP maps (or as overlay)

Overall Notecard Comments	
69	Recommend local communities make V zone and coastal A zone no build areas. Provide incentives.
70	New NFIP. It must reduce flood risk. The present program (overall) has caused flood risk to increase. Success in reducing flood risk must be measured annually and compared to redline to measure success or non-success and adjust
71	Minimal cost to taxpayer or better no cost to taxpayer
72	Not be a social program
73	Get rid of 100-year process. Maybe is low, medium, high for risk.
74	Lower administrative costs through e-business.
75	Risk communication is key! Must overcome psychological block. Fire = bad. Water = Good.
76	New approximate "A" zone publication with multiple options to develop flood elevations and effect on flood insurance cost.
77	Cabinet level agency - move out of Homeland Security.

Listening Session Evaluation Form Comments	
#	Comments
1	Many participants came to deliver a message, not to "listen" and broaden ideas.
2	Very good listening session. The usefulness will be judged by the quality of the changes, if any, that are implemented, and whether or not they are based upon the recommendations made by the participating groups and individuals. Thanks for a great job!!
3	Please produce follow-up steps to keep us involved in the process. Great session!
4	Friday breakout session two did not include topics identified in Thursday sessions, including map accuracy, probabilistic methods, and tools for risk assessment.
5	Breakout rooms should have been separate. Breakout sessions had all good topics but unfortunately wasn't able to attend all because the way they were scheduled, should have been a full day on Thursday.
6	Too rushed - more time needed.
7	Not enough participation from local government. These are the people enforcing the rule, let's hear their problems.
8	<p>NFIP is four decades old. The three 3-legs (mapping, insurance and flood plain management) have complimentary and competing interests. The NFIP has evolved over the years into its present form precisely because of compromises between interests. This listening session has merely highlighted the fact that these compromises are not perfect but exist because earlier discussion settled on what we have as the best workable solution.</p> <p>I don't see nor have I heard anything revolutionary here. A "bomb thrower" may say: "Kill it." A "social engineer" may say: "Make it (insurance) mandatory everywhere and manage 'floods' on watershed basis not merely the construct of 1% chance area."</p> <p>What has impressed me, after listening to the competing interests of the '3-legs,' is how well the existing regulations have found a workable balance between ID'ing Risk, Rating the premiums and building to avoid risk (not perfect, true).</p>
9	Maintain this approach. Local communities need assistance and support from FEMA. Land use planning is where it's at.

Listening Session Evaluation Form Comments	
10	I look forward to the summary document and next steps. I really appreciated the opportunity to represent the cultural resources side of things. Wish there had been more representation from the historic preservation and environmental and land conservation side.
11	Take on the road to Regions.
12	Need 15-20 minutes of group discussion to spark or solidify ideas before writing them down.
13	Better communication to allow more insurance experts to attend. This is a Federal program that needs to remain Federal with stronger mandates to keep it there without state and local involvement - as respects insurance only.
14	Thanks for the opportunity to offer input. Would like to see a definitive 'action" plan, or at least a post-meeting recap of the meeting outcomes and what, if anything will be the next steps. If we don't have this, we will feel the session was a waste.
15	Thank you FEMA for starting this collective dialog - we know within the NFIP many of these issues have been discussed forever. But taking these discussions out "on the road" is an important step toward making long needed changes. NFIP is in trouble. It needs help and real change. Other related programs must have simultaneous changes.
16	I think, going forward, this group needs to be kept involved. Developers and local elected officials did not appear to be represented.
17	I thought it was a great event and that it would be useful to take it on the road.
18	I thought this was an excellent opportunity for input on important topics concerning the NFIP. I strongly suggest that FEMA distributes a summary of the questions and responses received to those in attendance. Also, continue <u>listening</u> - add to April conference program, a listening tour - Part II.
19	Good discussion, would like to have a way to stay in touch with programs on these issues so need something beyond the web-site open for 30-days.
20	Should limit people to only two or three verbal comment otherwise we keep hearing the same over and over from the same person, and you don't get a broad range of input. The most vocal person doesn't always have the most accurate information. Allowed the discussion on some topics to go on way too long.
21	Take this show on the road! Wonderful to feel heard by FEMA!
22	You need to do a listening session solely for locals to get a better idea of what they are experiencing if you truly want the information needed for true change.
23	Listening sessions should be taken to the States - through the Regions - provide a facilitator "team" to each Region for a finite period of time to do this one activity.
24	No voice for those that think floodplains should be smaller. Not an easy discussion but if we want bold ideas - using the tension between these extreme perspectives creates an opportunity for new thoughts (need strong skilled facilitators).
25	Currently FEMA DAD is conducting input for a National Recovery Framework (NRF). The NFIP listening session and the NRF need to intersect (along with EDF 14 Long Term Community Recovery - part of the NRF).
26	Create a "blog" where participants can express ideas and <u>respond</u> to each other to continue the dialog.
27	Develop a think tank for integrating NFIP issues with disaster policy
28	Regions should be brought into the discussion at a greater level. If Regional staff implements, they need to be a part of the solution - making.



Listening Session Evaluation Form Comments	
29	Need to also include - how FEMA works. What should be dealt with at the Region? What resources are given to implement each program? This aspect also should be examined.
30	Have a national contest - How to communicate the 100yr flood plain or risk?
31	Should have follow-up meeting next year - 18 months
32	I will provide more comments via email. Thanks for the invitation!
33	Well done. Stakeholders will be interested in seeing how this process influences the outcome of the process and whether there will be continued opportunities to be heard.
34	The lending community was absent.
35	I liked the format but the time was too brief to get meaningful discussion. Suggest additional sessions to discuss major topics in depth and develop viable strategies and solutions.
36	There were too many breakout session topics on inter-related fiscal issues, leaving out place for broader mitigation discussion.
37	There was a much better representation of the issues on Friday than on Thursday.

NFIP Web Comments, November 5, 2009 – January 31, 2010	
#	Comments
1	Simplification of the NFIP has been a constant request for many years. The individual rating of risks, with the need for an elevation certificate for each building, is burdensome. With forty years of flood data, there should be a means of establishing community rates by zone and some other class rating method so that flood insurance can be written in a one sitting format and avoid the long process of acquiring elevation certificates, photos etc.
2	The data base for flood losses should be available to all who desire to access it, but especially those in the real estate, banking and insurance communities. This data is an essential consideration in the purchase of a property, and later in the insuring of a property for flood. Without access to the flood history, everyone in the transaction is working blind. For the realtor, it is an issue of full disclosure. For an insurance agent, it becomes an issue when advising a client or when recommending proper insurance coverage. Since loss data from other perils is available, flood data should not be considered private information. This is especially true of data regarding disaster assistance and government backed loans for disaster relief.
3	I do not feel that flood insurance should be required of all mortgage holders, regardless of zone as this is an unfair burden to those with little or no risk. However, it should be required, regardless of zone, for any property that has experienced a flood FROM A NATURAL DISASTER, such as a hurricane or storm. Also, LOMAs and LOMRs should be discouraged or disallowed. A property within a designated flood plain continues to be at risk, even if some individualized site specific factor makes it somewhat less than at rule risk.
4	The New Jersey Association for Floodplain Management (NJAFM, a chapter of the Association of State Floodplain Managers) acknowledges that states play a role in oversight of the NFIP, however, we believe that the program would operate with more compliance if local officials holding the responsibility of local floodplain administrator have a base level of training. The National Flood Insurance Program (NFIP) delegates specific oversight of building and land use responsibilities to participating communities. The duties then assigned to local officials include the review of building permit applications, decisions on a structure's substantial damage and improvement, interpretation of Flood Insurance Study and Flood Insurance Rate Maps, administration of the local ordinances, and

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	advice to the public, municipal staff and its representatives. Good knowledge of NFIP regulations and local ordinance requirements are necessary for local floodplain administrators. In addition, knowledge of mitigation actions, activities, and FEMA programs are becoming a critical skill set for local floodplain administrators. A training requirement or certification of these individuals must be mandated in the NFIP program in conjunction with the continued supervision of this group of pre-certified community staff by FEMA Regional Offices and states. NJAFM believes that adherence to the NFIP standards is crucial for the protection of the public, public and private infrastructure and, ultimately, the financial stability of the program.
5	Map Mod (2003 - 2009) made major strides to improving floodplain mapping nationwide however there are still numerous unmet mapping needs due to Map Mod budget constraints. There unmet needs were not "captured" during Map Mod and need to be tabulated, evaluated and prioritized so that developing areas with unmet mapping needs can be remapped as soon as possible. Otherwise we have nation-wide mapping consisting of old H&H data (1970's and 1980's) superimposed onto new DFIRMs. Highest remapping priority should be given to communities experiencing significant population increase.
6	FEMA is transitioning to a digital environment (mapping) so why not tie all RL, SRL, Section 1316, mitigation actions (HMGP/FMA) and NFIP policies to GPS coordinates. This allows communities and state and Federal agencies to overlay the data on DFIRMs and other digital mapping products to improve mitigation planning and disaster response and recovery. Even though this information is privacy protected it can be very valuable to the communities, State NFIP coordinator and FEMA.
7	I suggest having some sort of "constructive total loss" provision in the standard policy that would allow the NFIP to "total" a structure when the amount of the claim exceeds some stated percent of the market value. I believe it's ridiculous to pay a claim on a structure for which the damage exceeds market value. Even when it is elevated using ICC, there is still some residual risk. I believe it would be better to just buy the structure - quickly - through the NFIP instead of making the owners of such structures wait on a mitigation buyout project. This rewards people who had flood insurance coverage and, because of the reduced time involved - might increase the number of acquisitions in a community following a major flood.
8	Right now, when the owner of a property who participates in a post-disaster buyout mitigation project has Flood Insurance on the structure, they do not receive any benefit from that policy as any claim is seen as a "duplication of benefits". So, they get no benefit over their neighbors who did not have flood insurance. This policy does not encourage people to purchase flood insurance - in fact it makes them feel like suckers for having spent the money. I suggest giving some portion of the claim payment to the property owner as a type of "bonus" for having had the coverage.
9	I would like to see the LOMR-F process changed such that, while a LOMR-F may remove a property from the SFHA for regulatory purposes, it would NOT remove the mandatory insurance purchase requirement for the structure for lending purposes. There should still be a mandatory insurance requirement for such structures but, because the structure is removed from the SFHA, they'd be allowed to purchase a Preferred Risk policy instead.
10	You have to be kidding me! I now have to shell out \$2,000 a year for flood insurance because FEMA updated their maps. I live a half a mile from the ocean. A direct hit from a category 5 hurricane and my house would be untouched. a couple of blocks from the ocean maybe, six blocks! No way! I don't want it but my mortgage company is forcing me to take this policy. Here's the kicker, it doesn't even cover personal property, just the dwelling. Not only is this unconstitutional, it is life altering. \$2,000 is a vacation. And that's every year for the rest of my life. OUTRAGEOUS!



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11	<p>Small example of Local issues: As a floodplain Manager for a local county I wanted to purchase a floodplain model (wards storm water floodplain simulation system) to educate the residents on floodplain management. At a local level there is no money in our current budget for this item. I checked with FEMA to see if I could accomplish this through a Grant from the NFIP. I was told that this did not fall under any of the grants that are currently offered. So now I am unable to purchase this item and I then thought it would be helpful if FEMA gave small Gants (\$1000.00 or less) for local Governments who are trying to do the small things to make the big difference. Unfortunately something so small like this is a road block to do anything big. Thank you,</p>
12	<p>The Flood Insurance Rate Maps provide the 100 and 500-year flood hazard zones and floodway delineations. In designing a floodway it is assumed that full encroachment of the floodway fringe area will not result in more than one foot rise in the 100-year flood level. This analysis is solely based on the concept of the stream's capacity to convey flood water. That floodway analysis, however, does not account for the loss of the floodplain storage capacity. Natural storage areas attenuate the downstream peak flood flows. The failure to limit the fill and other development that take up storage can result in increased downstream flood flows. The increased flows from the loss in storage capacity when coupled with the loss of conveyance may result in increases in flood levels of considerable more than the one foot. I recommend that FEMA establish regulations that curb the loss of flood storage capacity. Several states have adopted regulations that prohibit fill or balance the fill with the creation of compensatory storage areas. Such provisions could work hand in hand with ASFPM's No Adverse Impact initiative or programs to protect endangered species habitat.</p>
13	<p>I have lived in this location for 9 years. Suddenly, my government has decided I am in a different risk zone w/ regard to flooding. Nothing has changed except for the quadrupled premiums from my insurance company! I have gone from preferred status to standard w/ no explanation or documentation of this action to me by FEMA. Please respond to this email. I will have to cancel the policy due to the exorbitant premium... I do not believe this is what FEMA wants me to do in viewing their TV commercials. Thank you,</p>
14	<p>In July 2004 FEMA paid \$25 million in a NJ flood disaster caused by a storm that resulted in 21 dams collapsing. The owners of the dams had minimal liability insurance and all fought lengthy court battles to keep from paying claims. If liability insurance was mandatory and required to be paid to victims in the event of a dam collapse then insurance companies would force dam owners to operate and maintain the dams or pay higher premiums. Insurance companies rather than FEMA would be liable for damage claims when dams collapse. I can provide additional information if you are interested.</p>
15	<p>I closed on my home on Sep. 15th and was told no flood insurance was required. 1 month later and I were informed I now needed it. Because of this change I am now unable to afford my mortgage!! Didn't you know that the flood zones were changing? Why wouldn't you tell me prior to closing so that this wouldn't have happened?</p>
16	<p>Insurance payments should be made every six months that way homeowners get a brake on a high cost ins. policy. Because we all know to pay a premium of \$1300 at once it's not easy to come by.</p>
17	<p>Flood zones mapped due to levees not meeting certification should have their own hazard zone designations based upon the likelihood of failure, as opposed to mapping these areas as if no embankment exists. Isn't an area protected by an embankment that is structurally sound, but lacks freeboard at less of a risk for flooding than if there were no embankment present?</p>
18	<p>Forms should be more flexible in order to reduce paper, and make them more useful. For example, don't require a separate form for each watercourse; allow the box to expand to accommodate a list of</p>

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	watercourses, or provide a prompt to add a reference to an attached list. This applies to the boxes for other sections as well, such as Section B, particularly the list of models, which currently provides very little room to list one name, let alone several.
19	Discharge and Floodway tables should be consolidated into one table.
20	In the Port Fourchon area we have a lot of trouble regulating trailers moving in and out of this industrial area. I think industrial areas should have different regulations as far as making legislation on industrial areas and being very specific about what is defined as an "industrial area". We have some of the nation's large oil companies in this area. They do not care about our (FEMA or NFIP) regulations and place or build whatever they want without permitting or elevating because they do not want flood insurance. Their decision in turn puts our Parish in violation and our residents at risk of losing their flood insurance. Suggestions would be having the Ports be responsible for what goes on in their "industrial areas" with violations not being held against the local government that is trying to protect their own residents.
21	Facts: Largest single line Insurer. Has made all the interest payments since borrowing money from Katrina – This is a program that works.
22	The NFIP and its local administration could be improved by having much higher rates in floodways. Also, under mitigation funding, both 406 and 409, communities should be allowed to buy conservation easements on floodplains. Additionally, communities with only the most basic "A" zone maps should be a priority for FEMA to remap and establish BFEs, even if the county has already undergone MapMod. If the county has a flood disaster declaration, then FEMA should be required as part of the recovery to update maps. Thank you,
23	I am the floodplain coordinator for Osceola County FL. The comment I would like to make is that the CRS Program is an excellent program and provides a great deal good for our county. In my opinion FEMA creating the CRS Program is one of the best incentives a community has to better their program. On the other hand I do wish in the program there was points for education and outreach. This would help local government with gaining support to do outreach in the community more. In all I am very pleased with the CRS Program and feel it is an extremely important part of Osceola County's Floodplain Program.
24	Need info on small waterway bridge modification grant assistance possibly available to a homeowner to reduce/eliminate repetitive flooding of home and landscape.
25	My flood insurance premiums went from \$317 a year to over \$1200 due to FEMA's new mapping. This is outrageous! I went from preferred status to standard for no reason other than someone redrawing lines on a map. My actual potential for flood has not changed. How can FEMA encourage me to purchase flood insurance at these ridiculous rates? Please respond. I'm seriously considering cancelling the policy.
26	I have had Repetitive loss for five floods at my home. The RCL number was off the previous RT and Box number. I'm in a vicious cycle. I want to raise my home and use ICC funds but I'm in flood zone x where my home and neighbors houses all flood. How can I change my flood zone
27	Flood insurance pricing needs to better reflect the risk of flood. Too cheap insurance vs. risk has led to development in areas that are too prone to flooding and has only served to increase the total amount of damage due to flood. Also, pricing poorly reflecting risk only serves as a subsidy paid by low risk areas to high risk areas, often from middle class Americans to those who can afford waterfront property. It needs to stop.
28	1. FEMA has made a decision to discontinue publishing paper flood maps except for one set per community when new maps are released. This has been done as a cost saving measure due to the

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price of printing three-color maps. As an alternative, there are various web based map viewing sources, and FEMA will distribute disks of images of the maps as well as the digital map files. While this is fine for more sophisticated communities, the northeastern states have hundreds, if not thousands, of small communities that have part time help, many of which lack computer sophistication. Some even lack high speed internet access. By not providing paper maps, many of these communities will in future years be completely unaware that they even have a flood map. This will be to the detriment of enforcing flood resistant development standards. Communities should, at their request, have the ability to obtain additional sets of paper maps within a limit at no cost to them. We feel that FEMA is simply off loading a cost for printing that is FEMA's responsibility

2. Flood insurance is required as a condition of a loan from any federally regulated lending institution if the structure securing the loan is in a mapped Special Flood Hazard Area. For newer construction, the flood insurance rates are actuarially based and are determined in large part by the difference between the Base Flood Elevation and the elevation of the lowest floor of the structure. For older structures, known as pre-FIRM structures, that were constructed prior to the existence of floodplain development regulations, flood insurance is subsidized by other rate payers. Many of those structures have basements in flood hazard areas and if they were rated on an actuarial basis, flood insurance rates could be in the thousands of dollars per year.

Even though pre-FIRM rates are less expensive than actuarial rates for structures with the lowest floor below the Base Flood Elevation, FEMA has been allowed to increase the pre-FIRM rates such that even the subsidized rate can easily exceed \$1,000 per year. This is not only creating a severe economic hardship in many communities, but it is creating strong political opposition to the National Flood Insurance Program. In fact, when updated flood maps are released, people see their risk as having to purchase flood insurance rather than being at risk for flooding. We believe that in order to maintain political support for the program while increasing the flood insurance policy base, thereby decreasing flood relief costs to taxpayers; pre-FIRM insurance policies should remain affordable. When new maps are released, structures that are newly shown as being in the Special Flood Hazard Area should be able to maintain an inexpensive Preferred Risk policy as long as a claim has not been filed, and should after that be grandfathered into the 'X' zone rate.

This should also apply when a levee decertification results in a structure being newly shown as flood-prone. This will result in a less contentious situation when residents behind levees suddenly find themselves in a mapped Special Flood Hazard Area.

3. FEMA should set flood insurance rating zones to be more closely aligned with the risk. Current Flood Insurance Rate Maps show an area as either being in or out of the high risk flood zone. However the location within the zone results in a huge difference in the actual risk. A structure may be in an area subject to five feet or more of water for a ten year event (10% annual chance flood), or one foot of water for a 100-year event (1% annual chance flood). Yet the insurance rates, particularly for pre-FIRM structures, do not vary. With more modern, digital Flood Insurance Rate Maps and computerized insurance rate setting, it should be possible to develop risk zones more closely aligned with the actual risk.

4. FEMA needs to provide detailed guidance on levee certification issues. It is clear that the FEMA regions do not all treat levee certifications equally. Not all require new geotechnical analyses. We believe that a levee should be able to be certified based on the as - built plans as long as Corps of

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	<p>Engineers inspection reports are satisfactory, the levees have not settled, and design drawings meet engineering standards. In that way, levees could be certified without the \$200,000 to \$300,000 per mile cost of a detailed new certification review.</p> <p>5. FEMA needs to streamline the Community Rating System process so that smaller communities can more easily meet the application requirements. The CRS provides flood insurance policy discounts in communities that undertake additional measures to reduce flood risk. Many communities meet the requirements to receive a CRS rating of 9 or better, however they lack the flood insurance policy base and/or the staff support to go through the application process. Without the flood insurance policy base, a community may not consider it to be worth their while to expend the effort to apply to the CRS. However, a simpler application process may result in more communities entering the CRS.</p> <p>6. Limits to Moderate Wave Action standards should be made part of the NFIP regulations. Newer coastal maps have been printed with a Limit to Moderate Wave Action designation. FEMA’s building sciences unit has determined that structures built to zone standards in coastal areas that have between one foot and three feet of waves above the stillwater flood elevation suffer significant damages during coastal storms. Some communities have decided to enforce more restrictive zone standards in the areas of moderate wave action, as shown on the newer coastal DFIRMs. By making this change in FEMA’s regulations, building codes and local laws will follow suit, resulting in safer construction practices in those areas.</p> <p>7. Flood Zone Determination companies should be regulated so that there is less error in the determination of a structures flood hazard. Many such companies do extremely conservative determinations, resulting in structures being unfairly rated and in property owners spending hundreds of dollars for Letters of Map Amendment. We recommend that there be a professional certification process for flood zone determination companies and those companies that fail to meet a determined accuracy rate should not be able to continue to provide flood zone determination services.</p>
29	<p>To encourage homeowners to improve their homes to include hurricane hardening, I suggest NOT including selected costs such as improvements to windows, doors and roofs to resist hurricane winds in the calculation of cumulative substantial improvement if done separately from other renovations. Thank You,</p>
30	<p>The floodplain managers in specific areas are competent, knowledgeable people. Can more discretion be built into regulation so that these people can exercise common sense and user their knowledge and expertise to meet the intent of the floodplain regulations when the letter of the regulations cannot be met?</p>
31	<p>Some small non-habitable buildings are exempt from code and permit requirements. Do these type of buildings really need to comply with floodplain requirements? Is there any way to ease up on floodplain regulations in this area?</p>
32	<p>Old FIS studies should be revised. Especially those studies that were done using SCS curve numbers for large watersheds. By performing statistical as well as deterministic analysis (Green-Ampt Loss Rate Functions), it has been observed that older studies (SCS Curve Number-based) produce unrealistic higher peak discharges. It would also be a good idea to gradually shift hydrologic and hydraulic analysis to "risk and uncertainty" based than "deterministic". This will not only have a huge economic impact by saving cost on structural flood control, but will also promote a sustainable floodplain management approach.</p>
33	<p>I wish we would basically do away with issuing FIRM panels on a certain date and go to a living map online.</p>
34	<p>NAHB and its members fully appreciate that floods are one of the most prevalent natural hazards, and</p>



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	<p>that flood losses are among the most costly of all losses from natural hazards. It was for these reasons that the NFIP was created and FEMA was charged with administering the program and implementing its provisions with the goal of reducing flood losses and limiting the Federal Government’s exposure to these losses under the NFIP program.</p> <p>However, floods are not the only natural hazard which results in significant losses. Wind hazards (hurricanes, tornadoes, and other severe wind events) also generate significant losses and a need for mitigation activities. Remodelers particularly recognize this need for mitigation, and in states such as Florida remodelers (and their customers) benefit from state policies and insurance incentives that promote wind mitigation. Thus it is of great concern to builders and remodelers when FEMA flood regulations appear to conflict with FEMA policies and efforts related to other hazards (particularly wind and seismic), and result in situations that discourage mitigation of damage from these other hazards. This is especially a concern when the costs of mitigating other non-flood hazards cause the total project cost to approach or exceed the 50% Substantial Improvement threshold. This is creating a perception that FEMA is singularly concerned with flood hazards above all other issues, and flood loss reduction and flood plain management are FEMA’s prime missions. Further, there is a perception that FEMA is promoting polices that, while protecting against flood losses, are creating barriers to other mitigation efforts and creating situations which are detrimental to public health, safety and welfare. We suggest that FEMA pursue a regulatory change to the the existing definitions for Substantial Improvement and repair of Substantial Damage. to incorporate three principal elements: (1) Exempt voluntary structural retrofits for wind and seismic hazards from counting towards Substantial Improvement or repair of Substantial Damage; (2) Exempt certain items of routine maintenance and repairs from counting towards Substantial Improvement or repair of Substantial Damage, even if they are done as part of a larger remodeling project; and (3) Exempt voluntary energy efficiency upgrades from counting towards Substantial Improvement or repair of Substantial Damage.</p> <p>A change to the regulatory requirements that would encourage voluntary retrofits would go a long way towards reducing the backlash in communities where new flood maps are increasing base flood elevations and expanding the flood hazard areas. They would also help relieve the pressure which some communities will be under to remove above-code mandates, such as freeboard and accumulative time periods for substantial improvements, which will otherwise result as many more structures are subject to NFIP limitations.</p> <p>We know that the incorporation of both mitigation and sustainability (particularly energy efficiency) into disaster recovery is something that FEMA (and HUD) are beginning to take an interest in. The recent Long Term Disaster Recovery Working Group has been soliciting input on how best practices for both mitigation and environmental sustainability can be incorporated into disaster recovery. Changes of the sort proposed above could provide a big step towards meeting these goals.</p> <p>NAHB staff and its members are well aware of the issues involved and the need to pursue mitigation for flood and other hazards. We are certainly willing to assist in developing guidance that will promote the ability of our members to mitigate for wind, seismic, and other natural hazards, and meet increasing the desire for (and regulation mandating) sustainability, while still limiting the possibility for abusing or gaming the rules to avoid mitigating for flood hazards.</p>
35	I would like to see that local floodplain administrators contacted prior to any approval of LOMA based on local knowledge of their areas



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36	All structures should be insured against flood, just as they are for fire. We all live in a floodplain; it is just the degree of risk that varies from location to location.
37	Allow policyholders to pay bill monthly.
38	<p>The best definition of insanity is doing the same thing over and over and expecting a different result. For more than 40 years, the NFIP program has been doing the same thing over and over, expecting a different result, but instead seeing the same result year in and year out, ever greater flood damages and claims. This indicates the need for a paradigm shift in the NFIP.</p> <p>Right now, the 100-Year or one-percent flood is identified as the area of risk. However, if the truth be known, we have no clue as to what the one-percent flood should really be as we only have a couple of decades to just over 200 years worth of usable data to work with to identify the one-percent flood. Statistically speaking, to be within a single standard deviation of the actual one-percent flood, we need 900 years worth of data. As we do not have that data, the mapping exercises the NFIP and FEMA go through end up not being worth the paper they are printed on. After nearly every single major flood event, the hydrology is re-evaluated, and most of the time, it is determined the value previously used for the one-percent flood is too low and must be increased. Many floods of records have decreased over time from being larger than the one-percent flood to being on par with the two to five percent floods. If we keep in mind that the climate is a dynamic, ever changing system, then the idea of predicting a specific size flood event based on a very short data record is laughable.</p> <p>Instead, what we should be mapping is the geologic (or geomorphic) floodplain. This is the relatively flat area of land associated with a river channel that is comprised of loose alluvium deposited and worked by the river system over the past several thousand years. The geologic floodplain can be easily identified using only photography and topography, and therefore can be mapped more efficiently and economically than attempting to do detailed studies, which are only valid for as long as the conditions in the system (development, vegetation, channel geometry, rainfall) do not change. Generally speaking, there will not be a flood event outside of the geologic floodplain of a given river system, which makes identifying the areas of risk easier. In addition, by mapping the geologic floodplain, the risk would automatically take into account the tendency for lateral migration within the river system as that lateral migration is what has increased the width of the geologic floodplain over geologic time.</p> <p>Now, obviously only mapping the geologic floodplain in the same manner we map the one-percent flood will lead to a greatly increased numbers of structures being mapped within the floodplain, but would not properly convey the actual risk. In the areas where we do have detailed studies, that data could be utilized to actually create zones of risk within the floodplain. From the Geologic Floodplain edge to say the 0.2-percent flood (500-year) boundary could be the Low Risk Zone. Between the 0.2 and the 1-percent (500 to 100-year) could be the moderate risk zone. Between the 1 and 2 percent zone could be the high risk zone, and the 2-percent floodplain or the floodway could be the Severe/No Development Zone. Each zone would then have its own rate structure based on calculated risk, but enough people would be identified as being in the floodplain to actually account for all of the risk associated with being in an area prone to flooding.</p>
39	Upon receiving claims that result in substantial damage to a property, the NFIP should consider using the claim settlement to purchase the property, remove the improvements and restore floodplain conveyance. This program could enhance local Flood prone land acquisition programs.
40	I am concerned that the NFIP 50% rule has been applied by the Santa Rosa Island Authority unlawfully

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	<p>and without regard to the rights of lessees on Pensacola Beach. According to the General Covenants and Restrictions of leases for Pensacola Beach, Section E., No. 1 Right to Prescribe Other Restrictions, Zoning, Etc.</p> <p>1. The Authority expressly reserves the right to classify and re-classify from time to time areas for zoning purposes and to prescribe, amend or revoke regulations and restrictions applicable to such areas and building and structures therein and the uses thereof, but no such classification, regulations, or restrictions shall apply to any portion of the island then under lease without the consent of the lessee thereof.</p> <p>The NFIP 50% rule has been applied to many homes, forcing the lessee's to tear down homes ignoring the fact that this program was put in force without consent of these lessees as specifically required in the leases. Please contact me about this situation. Sincerely,</p>
41	<p>Procedures for publishing FIRMS should be equally -100%- applied for all communities of the nation, putting revised FIRMs "on hold" for favored politicians is unethical and poor business practice for the NFIP, and ignoring flood risk is poor national policy. I suggest that the FEMA Inspector General enquire about this issue.</p>
42	<p>Policyholders who have properties that are in compliance with local codes should not have to pay the CRS fee as part of their policy premium</p>
43	<p>Orlando, Florida: We live near (350 feet) Lake Hourglass which has a "deep well" overflow well. This well serves as an overflow drain when the lake gets to a certain high water level. Thus, this Lake will never flood. The new FEMA maps now show our area within a flood zone and so we must buy flood insurance. The City of Orlando prepared the new flood zone info - apparently unaware of the deep well. The deep well is maintained by Orange County. How do we get the flood zone line corrected?</p>
44	<p>I have heard that all Florida communities were "auto-enrolled" in the CRS, I suggest that verification of NFIP compliance be required for all those communities.</p>
45	<p>I have owned my home for 17 years and have been required to have flood insurance for that entire time. My home is located several miles from open water (the bay in Union Beach) but I have a small creek that sits 6ft BELOW my property line approx. 50 ft from my house. My current status is pre-firm B Zone preferred and my rate is \$348. In July I learned that on the new maps my zone will change and I will lose my preferred status. I was advised to "grandfather" my zone which I have done, but imagine my shock when I learned that I will still likely see my rate increase from my current \$348 to over \$1200!! Add to that sticker shock the fact that all the media coverage seems to be focused on local areas/homeowners that were not previously required to have flood insurance but will now need it with no mention of homeowners like myself. These stories highlight areas in the Keansburgs and Middletown areas (the "wet side" of Rt. 36). When I say I was shocked to learn that while my neighborhood has NEVER experienced street or house flooding since the area was built in the early 1960's but I have been forced to carry flood insurance while areas that are just BLOCKS/FEET away from open water and routinely experience flooding were not is an understatement. I feel this current rezoning is a blatant example of taking from the "haves" to cover the "have nots". FEMA is dealing with a massive debt caused by hurricanes that predominately occur in the southeast and the northeast is being forced to foot the bill. I actually have a relative who lives in FL in a home that sits just above sea level, between the Atlantic ocean and a major river who pays less per year for her policy than I do!! She has sustained significant damage on 2 occasions and her policy costs less? How is that possible?</p>



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	<p>This summer we vacationed in NC and found that NJ is not alone...that area too is being unfairly charged (areas east of I95 are all in a flood zone)? This rezoning cannot be allowed to go through as proposed. Far too many families are being unfairly burdened with high cost insurance they have no need for and my family is one of them! I would love for someone to explain to me why I have had to carry coverage and will be required to carry even more expensive coverage when my home has never been at risk, while areas that have shown prior risk have not been required to carry insurance and now will do so at a rate lower than mine. This whole proposal makes absolutely no sense and is decidedly unfair. Thank you for the opportunity to express my opinion and concerns. I sincerely hope that FEMA will take these concerns seriously and reassess these zoning/rate changes. Families in NJ are already struggling with outrageous property taxes and auto insurance...how far can we as individuals be forced to stretch our budgets when our government agencies can't balance their own?!</p>
46	<p>Multi-family buildings should be eligible for coverage of up to \$250,000 per unit. As the program currently works, any building, whether it is a single family house or 100-unit apartment building, is only eligible for \$250,000 in coverage. We, Enterprise Community Partners staff, propose a new category be added for multi-family properties, or that multi-family be categorized as commercial.</p>
47	<p>Need to have one aerial and overlay. Too confusing for banks to use one, Corps to use another and government to use yet another....</p>
48	<p>SAFEGUARDING AMERICA'S COMMUNITIES AND THEIR FLOODPLAINS</p> <p>According to the National Oceanic and Atmospheric Administration, floods cost the United States more than \$75 billion over the five-year period ending in 2008, or an average of more than \$15 billion per year. These costs continue to spiral upward. Adopting federal policies that discourage development and other destructive and degrading activities in floodplains is critical to protecting communities and ecosystems from existing and potential climate change impacts such as sea-level rise, increased storm surges and flooding.</p> <p>SmarterSafer.org a coalition comprised of taxpayer groups and environmental organizations, as well as insurance and reinsurance industry groups - recognizes that adopting federal policies that lead to responsible development will benefit insurance consumers, the environment, and taxpayers.</p> <p>The priority goals of SmarterSafer.org include:</p> <p>Reducing loss of life and injuries due to floods; Decreasing the risk of flood losses; Reducing the costs of floods; Encouraging the provision of private capital to back flood insurance; Reducing the demand for federal disaster assistance; and Preserving and restoring natural and beneficial floodplain functions</p> <p>SmarterSafer.org seeks improvements in federal flood and disaster assistance programs that encourage better floodplain management, reduce property losses and costs to taxpayers, protect and restore critical ecosystems and improve public safety. Improved direction and coordination among all federal agencies floodplain-related activities is necessary to meet these important objectives.</p> <p>The SmarterSafer Coalition also wants to reform FEMA's National Flood Insurance Program (NFIP) in order to enable the program to meet its primary objectives of reducing flood losses and heightening awareness about flood risks. Keeping development out of dangerous and environmentally sensitive areas represents an effective and yet often overlooked method of reducing flood losses. Suggested Reforms to the NFIP and Related Flood Policies and Programs:</p>



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1) Adjust NFIP rates to reflect the actual risk of living in flood-prone areas. Many properties covered under the NFIP obtain below-market rates that mask the true risk of living in floodplains. As a result, the federal government is subsidizing development in dangerous and environmentally sensitive areas, forcing taxpayers to help defray the cost of properties that are in danger zones and leaving them on the hook to rebuild homes and businesses that incur flood damages. Phasing in risk-based rates, including a catastrophe factor, would save tax dollars. Risk-based rates including a catastrophe factor should apply to all properties. Some form of means-tested premium payment assistance (via grants or tax credits) to incumbent low-income homeowners is vitally important to ease any transition.

2) Require FEMA to establish policies that restrict NFIP coverage for new construction and ban rebuilding in high-hazard, environmentally sensitive areas; Assure that future mapping identifies such critical areas. Very high hazard areas -- such as high velocity floodways, mountain canyons and coastal erosion areas -- must be identified in flood mapping.

3) Reduce reliance on levees for new development and redevelopment; Evaluate levee protection so that high levels of public safety are maintained. Preserving and restoring the natural and beneficial floodplain function, along with land use planning that steers development out of the floodplain, provides the most cost-effective safeguard to communities against flooding.

4) Require FEMA to recommit to a national hazard mitigation policy that emphasizes stronger standards, including rules that place homes and businesses in areas safe from flooding. FEMA should promote wise floodplain management and greater use of non-structural mitigation techniques, such as voluntary buyouts, building elevations and open space preservation to reduce flooding risk. Communities should be required to prohibit all government-subsidized development from the mapped very high hazard areas. Similarly, federal subsidies of all kinds should be cut for communities that do not strengthen land-use and building code standards. The CLIMB project in Boston showed the estimated costs of 'reacting' to moderate floods is four times the cost of 'preparing' for floods through the use of natural floodplain protection. This is in line with the research conducted by the Multi-hazard Mitigation Council which found that a dollar spent on mitigation saves society an average of four dollars.

5) Require FEMA to revise the Community Rating System. The Community Rating System (CRS) offers discounted insurance rates to communities that voluntarily adopt and implement policies that exceed FEMA requirements to reduce flood risk. FEMA's CRS scoring and rating criteria should be revised to include greater incentives for the implementation of projects that restore and/or protect natural and beneficial functions that reduce flood risk and improve mitigation. In addition, FEMA must closely monitor communities' compliance. Communities that successfully attract private capital to underwrite flood risk should also receive consideration under CRS.

6) Require FEMA and all other federal agencies to use the best available data on recent flooding and potential climate change when producing flood maps and include '500-year flood' zones. Flood maps guide local planning and development patterns. FEMA must end the practice of revising floodplain maps to remove areas in the floodplain that have been filled, leveed off or major obstructions are placed in floodways, as development in these areas still puts people and property in harm's way and force floodwaters onto other communities. This year's floods on the Mississippi have once again shown that floodplain development, including changes on land cover, urbanization and other land use changes, increase flooding in downstream areas. Using our best available science, including identification of reasonably foreseeable future conditions, to guide future planning documents is a common-sense strategy to prepare for actual and future flood risk. Also, this year the Midwest experienced its second '500-year flood' in 15 years. With experts suggesting that climate change may result in more intense and frequent flooding in coming years, it is important to use the '500-year flood'

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zone to inform planning decisions if people and properties are to remain out of harm's way.

7) Require FEMA's flood maps to show 'residual risk' areas that would be inundated due to levee or dam failure, and apply the same standards for flood insurance purchase to properties in residual risk zones. Many Americans have no idea that they live behind a levee or below a dam until flood waters are rushing under their doors. Others falsely believe that levees and dams - and those responsible for their maintenance - will always keep them safe from floods. This provision would assure better land use and building controls in residual risk areas, help dispel the false sense of security from dams and levees, and prevent catastrophic disasters.

8) NFIP MUST NOT be expanded to include wind coverage. The NFIP is already over \$19 billion in debt. Expanding the NFIP to include wind insurance would also perpetuate the damage-repair-rebuild cycle by subsidizing more risky development. Congress should not further destabilize a program that already costs taxpayers more than \$6 billion a year and is financially insolvent.

9) NFIP should establish pilot programs intended to encourage private and partially private provision of flood insurance. Current private flood insurance programs are generally available to more affluent populations. Congress and FEMA should investigate ways to encourage the private and partially private provision of flood insurance for all Americans.

10) NFIP should limit the number of times that it rebuilds the same property. Severe repetitive losses place an enormous burden on taxpayers, communities, and the environment. Although a variety of mitigation, insurance, and conservation measures can serve to place limits on repetitive losses, Congress should establish a firm rule that no property should be rebuilt more than twice.

11) In reforming the NFIP, Congress and the President should consider the floodplain management consequences of federal programs outside of the NFIP and the FEMA. A variety of other programs in agencies ranging from the Department of Defense (Army Corps of Engineers) to the Department of Housing and Urban Development (Section 8 housing vouchers) have vast impacts on the manner in which the United States uses and manages areas that are likely to experience floods. Any comprehensive reform of the NFIP must take the consequences of these programs into account and modify them in ways that are likely to promote sound water resources management policies. Ideally, some aspects of existing programs, such as the Corps water resources projects, should be reformed directly alongside the NFIP. In other cases, the Congress should consider the creation of a new standing commission (or the revival of a dormant one) to provide ongoing monitoring and advice as to the likely floodplain management consequences of federal programs. The Administration, likewise, should work to improve and update the Executive Orders that set floodplain management and mitigation policies that impact federal facilities, and launch a review of all regulations that impact flood plain management.

12) Federal policy towards flooding should emphasize a multi-faceted mitigation strategy. Nearly all sizeable bodies of water will flood surrounding lands at one time or another. As a result, no single measure or series of measures ever could address all floods. Thus, insofar as the federal government engages in efforts to address the consequences of flooding, it should have a wide range of tools at its disposal. Levies, land buyouts, individual home mitigation measures, open space preservation efforts, and restrictive development guidelines for federally subsidized programs all have roles to play in any integrated strategy. Measures like levy construction that have received ample subsidies in the past might see their subsidies reduced or eliminated, while others, such as encouragement for individual home retrofitting, may be prudent places for government to invest additional resources.

***** SUPPORTING ORGANIZATIONS OF SMARTERSAFER.ORG Environmental Activists: American Rivers Ceres Defenders of Wildlife Environmental Defense Fund Friends of the Earth National Wildlife



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	Federation Ocean Conservancy Republicans for Environmental Protection Sierra Club The Nature Conservancy Emergency Preparedness Groups: International Code Council National Fire Protection Association National Flood Determination Association PlanItNow Consumer and Taxpayer Advocates: American Consumer Institute Americans for Prosperity Americans for Tax Reform Competitive Enterprise Institute FreedomWorks Taxpayers for Common Sense Insurer Interests: Allianz of America Association of Bermuda Insurers and Reinsurers Chubb Liberty Mutual Group Reinsurance Association of America Swiss Re USAA Zurich
49	To avoid confusion in future events no Flood Insurance Claim checks should be issued until a building permit from that community has been applied for.
50	I think that there should be a way to hold some of the flood insurance claims money until maybe the property owner submitted a contractors receipt or permit that would prove where the money was going and help the community with substantial claims
51	I've lived in a place for more than 30 years and I have never seen the place flooded, but I'm obligated to pay for flood insurance. I feel that this insurance should be optional.
52	Are the tax-payers who fund most of the reconstruction efforts and pay for most of the insurance costs being as proportionately well-represented (numerically) as those who have benefitted from this heavily subsidized program? I would suggest one (or more) tax-payers, who are only paying from and not benefitting from the program, to balance each of the 175 invited stake-holders listed with their obvious financial interest in the continuation of the program as is.
53	I live in an area that simply cannot ever be flooded.
54	Please remove us from the Flood Insurance Plan. The upper Niagara River levels are controlled by the Niagara Mohawk Power Project. The only time it ever flooded here was when the power project shut their intakes, and they paid for any damage caused. My house has never had any flood damage since it was constructed in 1962. My flood insurance this year is \$1300.00. This is 2 times what my Homeowners policy is, and I will never collect a dime because of the way the level of the River is controlled by the power authority. Please remove us from your Flood Maps. Thanks for your help.
55	Premiums in coastal areas (V zones and Coastal A zones) should be closer to actuarial rates to better reflect the risk. Structures within 500 yards of a SFHA should be required to purchase the preferred risk policy to take into consideration future conditions.
56	There needs to be Federal money available and assistance for planning and preparing for sea-level rise, including analyzing the risk through LiDAR data and/or other methods.
57	There needs to be a requirement in the Code of Federal Regulations that manufactured homes are elevated to or above the BFE.
58	In the CFR 60.3 b, there needs to be a specific requirement for the base flood elevation to be determined for all A Zones.
59	I have been forcibly carrying a flood policy on my home for the last 14 years. My mortgage company required it since they consider me in a flood plain. I discovered that the flood map they are going off of was made in 1950 and that a water dam had been built in my city since that time. I was told they were not likely to update the flood map anytime soon. My sump pump failed last fall, flooding my basement, ruining my furnace. My insurance carrier told me that the flood policy didn't cover anything unless my home was to crack off its foundation and to float down the creek. Which was not likely to happen since the dam controls water flow in the area. In short, I paid thousands of dollars into the flood insurance for no reason. My issue is the flood policy added almost a hundred dollars to my payment every month, yet covered absolutely nothing. I might as well have been paying for iceberg insurance in the middle of Arizona. I tried desperately to get someone to look at the flood map, no one would listen.

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60	<p>Good Day,</p> <p>I have a home in Hernando, County Florida. I live in the highest Gulf Coast Flood zone area as stated by authorities. I have lived in this area for 11 years. I have seen my NFI go up each year with no claims from me are from my area. My flood insurance has increased in that time about 40 or 50% and I do not understand why. I have never placed a claim and my property value has decreased about 40%? Can someone please explain why? What can I do to help myself? I have gone from paying 350 to almost a total for all insurances to nearly 7,000.00? Kind Regards and awaiting a reply. Thank You</p>
61	<p>I completely understand the sympathy behind NFIP, but it should be ended.</p> <p>This is a silly program. Why do would we make taxpayers fund risk that the private sector sees as too risky? Homeowners under the program have no skin in the game and the program actually provides an incentive to engage in the risky behavior we ought to be trying to eliminate. It is the property insurance equivalent of automatic health insurance for people with self inflicted pre-existing conditions.</p>
62	<p>The flood insurance program is poorly managed and cost the tax payer an inordinate amount of money. The home I own was built in 1961 and has water in the basement on ONLY 1 occasion. That happened when the Erie Canal was breached by a construction crew...an act of man, not God. I know this is the only time water was in the basement, because my family has owned the house since it was built. It cost me \$2000 per year...for what? And I can't even pay in installments! Other taxes can be paid over time, but not this. I think it is another case of too much government. I can't afford this tax (insurance) and it should be my choice...not the government. I don't pay that much for auto insurance and I run a risk every day of needing that. This is just another unfair tax burden on a small segment of middle America! I know what my risk is, or in this case, is NOT.</p>
63	<p>I currently have flood insurance, which was purchased in October 2009. We waited the 30 days, and within that time period, found out we have to move to resolve conflict with our neighbors upstairs. We are staying in the same apartment complex, only moving about 300 feet to a new building. No elevation change either. I understand having to cancel my current policy, and start a new one at our new home, but why do we have to wait 30 days? I don't think that's a fair policy.</p>
64	<p>Once a lender has notified a homeowner that insurance is required the homeowner has 45 days to purchase insurance or show proof that the home is not in the flood zone according to the mandatory purchase requirements, Section C General Provisions Sub-section h (1) . Many lenders will only accept a LOMA as proof of the home not being in the flood zone. The NFIP mandated turnaround time for a LOMA according to CFR 44 Section 72.4 G is 60 days. This does not provide a homeowner adequate time to dispute the lenders determination. This leaves a 15 day window that the homeowner has to purchase insurance or have the forced place policy assigned. If the LOMA is approved and the homeowner has purchased a policy they would be eligible for a year's premium refund. This is assuming a homeowner has an extra thousand or so dollars to purchase said policy. If they allow the lender to force place a policy there is no guarantee for a refund if the LOMA is granted. In fact many lenders will pro-rate the amount of insurance being charged back to the date of the map or the date of the standard flood hazard determination form they hired a company to fill out for them. Two obvious solutions to this problem stand out. The first being change the amount of time allowed to show proof of insurance or dispute the lenders determination from 45 days to at least 60 (the amount of time FEMA allows to process a LOMA). The second being regulating all banks that force place a policy to purchase an NFIP policy for the borrower ensuring the refund if the LOMA is granted.</p>
65	<p>I believe that if one were to carefully examine the state of our Nation's floodplains before NFIP, tried somehow to estimate what would have happened in terms of development in hazards zones and</p>

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	subsequent risk had the program never been established, compare that finding to the situation today with NFIP in place, warts and all, one would find that perhaps NFIP is the most successful mitigation program in world history. Although I only worked for FIA/Mitigation for a scant ten years and that was ten years ago, I am very proud to have contributed my part and to have been a part of NFIP and the many wonderful professionals working the program now and in the past.
66	Make the NFIP database (except PII data) available to the public via the internet so that anyone can see which properties by street address have had NFIP claims, how many claims, how much each claim cost, etc.
67	Provide all of the flood map data and latest updates to Google Maps so that they can include flood maps as a layer in their amazing mapping product.
68	The sample format for lender notification to the borrower in Appendix A to 12 CFR Part 339 is lacking critical information for the borrower. The notification should include the name of the entity making the SFHA determination and the FEMA community map panel number and effective date of the map used to make the determination.
69	We have been waiting for some time to learn when Flood Insurance will be required instead of voluntary, as it is now. What is the projected date when it will be required and what is holding it up?
70	<p>You would need a book the size of a family bible to detail all the problems with this program. Apparently you haven't read the reports by the Congressional Research Service, The Government Accounting Office, the Congressional Budget Office, and the National Academies Press just to name a few agencies that have reported serious issues with the NFIP.</p> <p>In Congressional testimony earlier this year FEMA/NFIP stated that it was "their goal" to collect in premiums twice the average annual losses- they SHOULD have added that at that time they already exceeded that goal by 16%. Of course accuracy, or total lack thereof, in any part of this program doesn't seem to concern anyone at the NFIP. Since then thousands of additional homeowners in all fifty states have been forced to purchase flood insurance based on maps, the accuracy of which is dubious at best and fraudulent at worst.</p> <p>This may sound contradictory at this point, but I hope you are wildly successful into forcing even more homeowners (or victims) into this program. The more people being victimized by this program the sooner it will be exposed for the fraudulent and deceitful maps, computer models and questionable practices that are either used promoted or endorsed by the NFIP.</p> <p>DO NOT RESPOND TO THIS MESSAGE AND DO NOT ADD ME TO ANY OF YOUR MAILING LIST. I HAVE BEEN THERE AND DONE THAT. THE FACT THAT YOU HAVE THE AUDACITY TO REQUEST INPUT IS A FAR BETTER REFLECTION OF IGNORANCE THAN IT IS OF CONCERN. ANYONE CAN USE ANY SEARCH ENGINE ON THE INTERNET ASK FOR NEWS ABOUT "FLOOD MAPS" AND GET AS MANY AS A DOZEN RESPONSES DAILY FROM NEWS SOURCES ALL OVER THIS COUNTRY.</p>
71	I would like to make my impression of the program known. I had the opportunity first hand to be involved in a claim. The process was quick but the results were far from fair. We were not all protected because you had a different idea from the regular insurance company's of who should cover damage from a storm surge. Hurricane Isabel in the Maryland area left a lot of us with damage we had to pay for ourselves because it was easier to just do so than fight between you and our insurance companies. Damage is damage and we paid for both insurances and neither wanted to take responsibility and make restitution. Plus we were told that things not covered could be taken off taxes as a lost but you



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	failed to say it was percentage based upon your income. What did that matter I had a loss now and could not recover because my income was too high? I didn't make this when my things were bought years ago. Please try to get together and be fair to the little people and not always give to the rich in coastal areas of the Carolinas to rebuild on the dunes their million dollar houses while us small people of Maryland must pay ourselves because a storm surge is not covered by either plans. Thanks for the time to speak out for the small folks.
72	Hi, thank you for wanting comments. We are people whom wish to build our community at a pace that will not break the bank. I wish to dream the American dream. Will the day come when common people will no long be able to grow at our own pace? Build with us, help us don't just bill us. I'm a mom and pop American. I already feel only big business is able to build and develop. Please be a part of us. Set some funds available to help us build to your guide lines. I fly the no to FEMA sign because I fear you will be a dream crusher not a dream builder. Change the normal be our partner not a liability Thank You for encouraging comments
73	About six or 7 years We had a storm that damaged a lot of homes in East Orange and in the Garden state, New Jersey. Many homes needed assistance in getting repaired but since they are not in a flood zone Homeowners did not have to carried flood insurance and many homes owners did not received the help from FEMA. We were told to contact/ call our insurance provider. Your agency was incompetent then and even more so with New Orleans people are stilled suffering and displace.
74	The adjusters are not following FEMA guidelines when adjusting claims. For a select group of persons they pay, But for others they underpay. If my adjuster would have done what they were hired to do. I would have moved out of the area. But if you are going to nickel and dime me then I have no other choice that to stay and repair. Certainly, I would have been one less person to have to deal with in the event of another flood.
75	Pre-FIRM structures should be automatically rerated as Post-FIRM when the NFIP claims data shows 50% damage; then allow owner to appeal based on local community substantial damage determination documentation.
76	The public interest would be well-served by tying NFIP and Treasury Terrorism Risk Insurance Program (TRIP) in with FEMA's Public-Private Sector Preparedness program. Would also provide a model for commercial insurers to assess preparedness versus insurance premiums.
77	I believe flood insurance is a good thing. It fills a void. I think better and tougher enforcement of floodplain ordinances is needed. We cannot continue to build in the floodplain. It is a HAZARD!
78	I own a condo in a flood plain. Currently we do not have flood insurance because we cannot afford to pay a one year premium in one lump sum. Why can't the insurance be billed like any other home owners insurance? (Monthly, every 6 months, etc.).
79	In 1996 my part time business property flooded which of course was not covered under FEMA nor did I have flood insurance because this area had not flooded before so no one was aware of the risk. I did receive a grant from the state of WV after much research. All were aware of the drainage issues from a shopping area on down the road which drained into the drains in our area. A collection pond between the 2 areas would probably resolve any future problems. Restrictions and control over water drainage when areas including residential areas are built would work well also in prevention. I have flood insurance now which was a stipulation of the grant but it will only pay so much...the horrible clean up is going to be on me again plus I will lose revenue while in the clean up process. No one ever seems to take note until a disaster happens. Potential problems could be prevented with proper pre-planning, laws, enforcements of codes etc. Every time a hard storm comes, I become very stressed and on several occasions have moved furnishings to a higher spot in the facility. Large areas that affect a large

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	number of people, i.e. New Orleans...Always get action but the little people in smaller rural areas get forgotten and we individually suffer as much as anyone else in other areas. You would save money and human resources and time if more were done in the prevention areas especially after there has been a problem and the powers-to-be are aware of them.
80	County Zoning Unit should have info on areas that are flood zones and it should be public info. Builders should also have this info; but whether it is shared to homeowners is key. Insurance companies needs to be held accountable for price gouging homeowners after a flood. Flood insurance should be written under homeowners insurance just as tornadoes/lightning.
81	The annual verification that a structure is still "elevated" (no new enclosure below BFE), as done in Monroe Co., FL, should be done nation-wide.
82	I believe that people who want to live on the coast should receive a realistic premium (not subsidized) and if a homeowner has a home that has flooded more than 3 times they should not get subsidized insurance. If this is achieved the NFIP can work as it is supposed to.
83	Non-compliant "elevated" structures should be rated (as the rating manual instructs) to reflect the LFE is in the enclosed area below the BFE rather than using "loading factors".
84	Quality Control of policy rating should be increased to facilitate correct premium income and reduce fraud.
85	Decisions concerning NFIP compliance matters (NFIP Probation) should be done by professionals as a matter of public administration -with input from NFIP State Coordinators- rather than these matters being decided by politicians.
86	Current risk data should be used for premium rating, communities should not be given a choice of using obsolete 20+ year old data for matters of local "convenience" as is happening in the New Orleans Metro (5 Louisiana parishes)area where publication of Preliminary FIRMS was suspended.
87	The NFIP should use the same rules for all NFIP communities; New Orleans should not receive special treatment.
88	The NFIP should phase out the Pre-FIRM subsidies over a ten year period, starting 1-1-2010.
89	I believe that the policy limits for the dwelling policy should be raised to 350 on the dwelling and 200 on the contents. With a choice of deductibles of 1000,2500,5000
90	Letters of Map Revision based on Fill should only be granted where fill is placed during construction. Post construction fill placed around a structure to raise the lowest adjacent grade does not make the structure any safer from flooding and should not remove it from the mandatory purchase requirement. Additionally, the truest way to make sure that the risk to life and property from floods is reduced is to go back to requiring that both the lowest adjacent grade and lowest floor are above base flood elevation in order to be eligible for any type of LOMC.
91	Although the NFIP is a very valuable item and important to the recovery ability of homeowners, it does appear a fairer schedule of coverage to all the citizens of our nation is in order. To wit: Homes in flood plains and beach areas which suffer continuing damages/destruction from storms/natural disasters should be limited to two (2) NFIP payments. The limitation to two would ensure the homeowner was made-whole after a maximum of two catastrophic losses and the other homeowners using the NFIP would not face rising NFIP cost increases related to habitual payments to homes which are continually damaged and/or destroyed. This would also promote the mitigation of continuing building on already fragile wetlands and coastal flood plains.
92	I had a flood in my home and it was hard to get paid for the damages, the adjuster stated damages at 65,000 and the end result was 38,000 checks. The cost is way too expensive.
93	We had none. Yet we have a storm water easement that collapsed and backed up. We are not in

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	floodplain. Local government did not help us with cost of flood damage-complete duct replace, carport, drive, concrete walk, pumping crawlspace for a year. Had we had the insurance, we wouldn't have been treated so badly by Nashville Metro Davidson County Storm water Dept and left out of pocket thousands for community runoff and there negligence in not fixing a collapse we reported 6 months prior to Tornado in April 2009. We took and are still taking hit and our community has Nashville Mayor Karl Dean's big "Water Infrastructure Federally funded program." It is a sham. We have all documentations, photos, movies, their correspondences, and an over-zealous sensationalist journalist and hostile neighbor News Report as proof. You can't sue City Hall they say. We are sad as our house appraised for less than six years ago because of damage. Reform a city level a must!! Hold City Officials accountable for lack of planning and poor management, not to mention, blatant negligence. Altruism only goes so far when it hits your home so hard.
94	We live in what is considered a flood plain. However, our particular property is higher than most others in the area. In a devastating 1933 flood, our home, built in 1860, was where the local folks parked their cars. The water came up close to the house, as we understand it, but not up against or into the house. Recently, Hurricane Isabel, another devastating storm for this county, brought water near, but not against or into this house. And yet, we are forced to pay ever increasing flood insurance premiums for folks to rebuild homes in areas that flood regularly. That is outrageous! If people wish to rebuild in such flood prone areas, they should absorbing the increased cost, not those who are generically included in "a flood plain". If they don't want to pay extra to remain in a disaster prone area, they should build their houses well above ground level. In our area, new homes at or near the water are required to have the first floor 8' above ground level. I should think this would reduce local flood insurance premiums, but, as I understand it, premiums are based on national flood recovery costs. This is convenient and profitable for the insurance companies, I'm sure, but needs to be addressed by FEMA.
95	As everyone else who has an issue with F.E.M.A. I feel the lack of commonsense is the biggest issue. I live on a small street with a creek that has at the most on any given time inches of water. There are 4 houses that border the creek. My house at the minimum is 12 feet higher than the other 3 houses. I AM THE ONLY PROPERTY THAT IS REQUIRED TO HAVE FLOOD INS. Yes there is an appeal process but in order to have it done it will cost me 700 to 1000 dollars...I am disabled and on SS disability I cannot afford to fight this. NO where in BERGHOLTZ should people be subjected to this ridiculous ins. Like I said you don't need a survey or a plane flying over to get the measurements JUST USE YOUR EYES and a bit of commonsense.
96	My mortgage company was sold and they never paid the flood insurance bill. By the time we caught it there was a lapse and now we are homeless and out of options thanks to your "wonderful" program. I paid my bills, and it's not our fault, yet we are still homeless and nobody will help us.
97	In the 10+ years we lived in Wheatfield, we never ever had water in our basement. It doesn't make sense to have to continually pay flood insurance.
98	FEMA is a cost nightmare for the middle class person that owns property in the Florida Keys. Because my property is listed as VE, even through the last two hurricanes that have hit produced little or no water on my property I am required to pay 3,000.00 dollars each year. Yes that is 10 times the average Flood policy. Yet the people in AE areas received 4-5 feet of water in the in the last two hurricanes. Wealthy people that live in VE zones simply pay off their property and avoid the insane cost of VE zones. The rest of us a stuck with the burden.
99	RURAL COMMUNITY FLOOD MAPS USED FOR SET FLOOD INSURANCE RATES ARE OLD OR OUTDATED. RURAL COMMUNITIES RARLY HAVE THE MONIES TO KEEP MAPS UPDATED. VARIOUS STATE AND

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	FEDERAL PROJECTS CHANGE THE FLOOD DRAINAGE AND CHANGES TO FLOOD MAPS RARELY CHANGE. THESE MAPS ARE USED BY MORTGAGE AND INSURANCE COMPANIES TO SET RATES. DOES FEMA HAVE A MAPPING PROGRAM THAT CAN BE SEEN ON LINE?
100	My area has never flooded. Your insurance would not cover anything unless the structure is damaged. Requiring me to purchase this is a death blow to me trying to sell. It should be up to the individual to buy or not.
101	I understand you are bound by the restrictions imposed by Congress. But, it would be a good thing to price flood insurance so it discourages building in flood plains or other hazardous areas flood insurance should not encourage people to build in areas that are inherently unsafe.
102	My homeowner's policy only covers sump pump backup. All other types of water damage are excluded. What would it add, per homeowner, in percentage of annual cost or actual dollars, to add all types of water damage coverage if it was legally required for all home insurance policies? I think, like health insurance, the bigger the pool, the lower the cost.
103	I feel that the flood plains are not accurate. I live a 100 year flood plain that has never flooded. I pay 1600 dollars a year for nothing. Every year my premium increases approx. 100 dollars a year for nothing. This is money my family could use for everyday essentials. I feel I am paying for other parts of the country where flooding occurs often. These flood plains need to be changed.
104	How is it appropriate to charge flood insurance to people who will never be flooded, just to make up for all of the idiots who build in real flood zones! Charge the boneheads who are rebuilding New Orleans, and the ones who rebuild in the low lands along the Mississippi and Missouri Rivers! Leave the rest of us alone!
105	I recently purchased a house in Wheatfield, NY that is in a supposed Flood Plain. The house has never had a flood claim filed and it never will unless the entire city of Niagara Falls floods, which is impossible due the extreme flow capacity of the Niagara River. Anyways, now I'm forced to buy this bogus Flood Insurance which costs twice as much, and covers less than half, of my home owners insurance. Just because the NFIP is 19 billion dollars in debt, because they didn't plan that a city, which is several feet below sea level, could flood, shouldn't give them the right to force me into overpriced, useless, insurance to cover their butt.
106	The Program only works for the Insurance Industry. \$.80 cents of every premium dollar goes to them. Lenders and property owner are forced to participate. Lenders face fines. Low cost plans as low as \$199.00 per year, is a farce. The program owns the tax payers over 20 billion on notes from the treasury. You are using the program changes in forced enrolment to pay back the same tax payers with their own money. The list goes on and on, I sure you get my point. The program has never worked and will never work. Yes the NFIP should end and very soon.
107	We have been requesting that your consultant for this D-FIRM project provide copies of the information he used to draw his unreasonable flood plain boundaries. They have been unable to produce this information or provide any justification for their proposed flood plain boundaries.
108	Policy included contents coverage without anyone asking us about this. We did not want or need it. Our house was raised on cribs for the construction of a new raised lower story and there were no contents. There will never be contents at the lowest level. Can we get a refund? State Farm said the policy could only be changed at the renewal date.
109	Property on man-made drainage ponds should not be included.
110	To whom it may concern, The comments and suggesting below are discussed in much greater detail in our book. Floodplain Management: a new approach to a new era (2009 Island Press). Feel free to contact us directly. Not

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addressed by the NFIP.

Approaches to reduce flooding losses that are neither supported nor discouraged by the NFIP include:

1. Addressing downstream effects by discouraging use of fill to elevate structures or encouraging water spreading to increase flood storage, dampen energy, and expand lateral biological continuity.
2. Controlling lateral channel movement by installing friction devices to dampen in-channel and overbank energy.
3. Addressing hazards that are not directly related to inundation: sediment transport, erosion, scour, water quality, and habitat issues.
4. Addressing changes in flood effects over time, including changes resulting from increased development and its cumulative effects, land use and land cover changes, and climate change.
5. New building technologies, including methods of flood proofing residential structures, and designs for floating or temporarily floatable structures. Existing examples are found in The Netherlands and elsewhere.

Possible NFIP improvements

1. Structures are often rebuilt in places where they cannot be mitigated. Insurance allows flood prone property to receive claim after claim. The NFIP should have a mandatory ceiling as to the number and total claims received.
2. There is a need for watershed-wide management. Incentives, agreements, and additional legal tools that encourage watershed wide management need to be developed. These could include mechanisms to allow communities to increase discharge retention through low impact development (LID) and forest and agricultural practices
3. Regulation must include avenues to exploit natural processes that reduce risk.
4. The NFIP should provide mandatory incentives to vacate the floodplain where mitigation solutions are not possible.
5. The NFIP must discourage the use of fill to elevate structures and encourage the spreading of water over the land to increase flood storage, dampen energy, and expand lateral biological continuity.
6. Regulations to manage development within the storage floodway need to be developed. This would include all development that did not reduce detention opportunities.
7. Future-conditions floodplain maps should be required. The NFIP should require regulation to these future-conditions maps. Many communities currently manage their floodplains using such future-conditions maps, even though they are not currently required.
8. FEMA has embarked on a billion dollar nationwide mapping program called the Map Modernization Management Support (MMMS) program. A wide array of Flood Insurance Study (FIS) information is being digitized. The program is currently not funded to integrate updated hydrology but it is a platform with the potential of allowing low-cost map revisions as new hydrological information becomes available. At present the MMMS products reflect current conditions, but the MMMS program could make it easier to support the preparation of future-conditions maps

A. The future-conditions floodplain maps could be based on both natural conditions and human interventions. That is, communities could reduce the area designated as flood prone on the future-conditions maps by applying NAI policies, LID practices, and other techniques to ensure that post-development discharges are less than or equal to pre-development ones. In addition, communities could make use of natural depressions, wetlands, forests, and other existing watershed features to store water and preserve or even enhance their flood-reducing natural processes.

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	<p>B. The insurance maps would reflect current conditions, so that flood risk and the appropriate insurance rates can be determined. With the MMMS tools, they could be updated regularly “perhaps every five years. Existing floodplain ordinances that meet NFIP standards would apply. Future-conditions maps could trigger a similar but more flexible set of NFIP regulations. These regulations could allow structures to be built below the future-conditions BFE if the structures could be easily retrofitted as projected flood levels rise. C. New maps, identifying watersheds, along with detention and retention areas, and estimated rates of change is important. D. Secondary hazards, such as debris, velocity, erosion, and meander belts, need to be addressed. E. Opportunities for storage detention, vegetative retention and friction, and beneficial riparian corridors need to be identified. 9. Floodways are useful in conveying water through a valued area while minimizing adverse upstream flooding impacts. They work if all that matters is getting water out of the way. But traditional floodway designations along an entire watercourse can have harmful effects on many of the attributes we value. Floodway designations: A. Are not designated with downstream impacts in mind water reaches downstream communities faster with minimal reductions in discharge. B. Can reduce storage, lessening recharge opportunities. C. Often concentrate stream energy that degrades channel stability, scour riparian areas, and lead to a change in the ecology of an area. D. May alter sediment transport mechanisms. The quick flush properties of floodways may be needed through developed areas, but other floodplain values can be benefited by adopting a more comprehensive approach. And flexibility is currently possible. Yet, removing the floodway without replacing this designation with other regulator guidance can also cause adverse effects. New built environments and accompanying disturbances can remove storage, because increases in flood elevations, and water to back up onto land not otherwise flood prone. The NFIP and FEMA only map conveyance floodways. However, alternatives exist through density fringe designations, the ad hoc storage capabilities of some floodways, and even zero-rise designations. These help reduce at least two adverse floodway effects lack of storage and the focusing of stream energy. Also, many communities have adopted compensatory storage regulations within floodplains including floodways. Thank you,</p>
111	<p>Mandate the City Mayors to improve on the conditions of the roads especially those known areas where flood gates are to occur. Make every city responsible to ensure the safety of the people but ensuring that drainage sewers are in every major road, highways and bridges..</p>
112	<p>In any insurance program repeat claims will eventually become the most expensive part of the program if they are allowed. The main risk that is insured against with the national flood insurance program is a type of flood known as riverine flooding. In the areas where it occurs it is a regular occurrence. It would be wise as an insurer to set a threshold for damage of say 70 or 80 % loss where you simply total the insured property. It can then have title transferred to the Department of Interior where it can be cleared of man made improvements and then it can be used as a wilderness area. In a decade or two the number of repeat claims will drop to a very low level since the exceptionally high risk areas will be converted to wildlands/wilderness. This will also offer an added benefit in reducing runoff and it will provide green space in areas of the country that is not currently so blessed.</p>
113	<p>My house sits in the X zone. Boundary between the AE and X zone. But is reported in the AE zone. The structure is in the X zone and backyard in the AE. The creek is about 120 feet from the back of the house. Besides the back of the house has a pronounced slope toward the front bank of the creek. The creek is about 4 feet wide. And this place never has flooded. In 2006 fell 16.5 inches of rain, and we did not have one drop of water inside. The house is located after the escape road line. Please help.</p>
114	<p>Is there a program that can help unemployed people (not by disasters) to have help with paying their flood insurance. Banks have ordered increases in premiums and what if you can't afford to pay?</p>



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115	Writing Flood policies is a nightmare for agents with all the required details. It's no wonder so few people have policies. Please simplify the writing and agents will write more of it. Thank you,
116	As a Land Surveyor, I find the "new digital maps for my county virtually unusable. The maps are too large 15-16 megs for easy use. The format is not a standard useable AutoCAD friendly one. If FEMA's goal is to all digital - then it must incorporate all user groups not just those in the arc, gis world.
117	It would really be nice if the Banks/mortgage companies at least could understand that all properties do not reside in areas with Base Flood Elevations. I recently had a surveyor complete an elevation cert and forwarded it to my mortgage company. Not only will they not accept it, their flood map evaluation company has refused to accept it due to this fact. I've double checked with my building code manager with the county, and my surveyor. This is becoming bureaucracy at its worse, and I would like for FEMA, if they are going to place burden of proof on the homeowner in this way, at least require the banks/mortgage companies understand the information and requirements they are forwarding onto the homeowners.
118	Mandatory NFIP agent training is a must if the NFIP is to have an informed and properly insured public. The myths of coverage persist at the agent & consumer level. All policies need to be underwritten to ensure adequate coverage, insurability, appropriate cost and eligibility. The fiduciary responsibility of the NFIP is threatened by the current approach.
119	It does not appear that FEMA has a strategy for taking action to reduce the constant drain these properties represent. A defined action plan is needed to identify the problem and the resources available to reduce the impact these properties have on the NFIP. An office of Repetitive Loss should be created at the HQ level to guide Regions, and there resources, especially in a post disaster environment.
120	The regulations require borrower notification 'a reasonable amount of time' in advance of settlement. Many lenders think one day is a reasonable time, but it is almost impossible to get a surveyor scheduled to provide an Elevation Certificate needed to purchase their own policy in the time allotted by most lenders, which leads to expensive forced-placed policies. More advance time should be required for borrower notification.
121	Many lenders do not understand the source of the SFHD Form used by their map determination companies to report their results. The lenders read the top of the form that says 'FEMA', the determination that says 'flood insurance required' and report to their borrowers that FEMA has determined them to be in the SFHA, when, in fact, it was a private determination company that made the determination.
122	Streamline the PMR process so that communities don't have to wait an additional 2-3 years for new maps. There is no real reason a PMR should take any longer than a one-panel LOMR. Also, provide explicit guidance for levees regarding the 500-year event. Allow communities to apply same criteria to levees for 500-year as for 100-year. Allow communities to remove 500-year designation from an area by virtue of a levee. Make DFIRM database items available via FTP server or website. Base map information, specifically topo., should be available for download. The whole point of DFIRMs is convenience and access to base map info used to develop them. Therefore, give us access to the data. Develop DFIRM production tools that don't require proprietary ESRI software, especially not the extremely expensive ArcEditor or ArcInfo platforms. At least make it available on less expensive ArcView platform.



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	Allow states to administer Flood Insurance Program on their own, similar to the way states can independently administer NPDES. Then submittals don't need to go through far-removed federal agency (or contractor) and direct interaction with reviewers is more likely. Provide states money to administer on their own or they can hire contractor to do for them. I believe local administration will greatly speed up the LOMR submittal and review process and provide submitters with a much better chance to discuss LOMC submittals with reviewers.
123	The elevation set in the rate on the town is in error at 11ft when it should have been set at 9ft on the 88 datum as it should be the same as the town of Sea Bright , New Jersey which is on the Atlantic Ocean, Where Keansburg is on the Sandy Hook Raritan bay and has protection DIKES AND PUMPS THAT HAVE BEEN WORKING GOOD FOR FOURTY YEARS.
124	I am the Executive Director of the Center for Economic Justice, a consumer organization focusing on insurance issues. We have worked on property insurance and catastrophe issues for over a decade and serve as a designated consumer representative for the National Association of Insurance Commissioners. We have commented many times on the problems with the NFIP to insurance commissioners and policymakers it is an inefficient program structured to create conflicts of interest for insurers and failing to implement the essential loss mitigation necessary for insurance affordability and availability. Given the confines of this method of providing comments, we ask to be included in the NFIP outreach to interested parties. Our sole comment in this forum is to suggest that the NFIP be transformed from its current structure to a simple reinsurance program with insurers required to include flood coverage in the standard homeowners' policy. The provision of an all perils policy by insurers is not only necessary to provide consumers with a policy providing meaningful coverage, but necessary to broaden the risk pool for flood exposure and to fully engage the insurance industry in loss mitigation. There is no reason for flood not to be private market coverage as is the case in Europe. Were flood a private market coverage, insurers would be far more active on flood loss mitigation utilizing the same modeling firms that insurers use for flood in Europe and for other catastrophe perils in the United States. The NFIP as a reinsurance program would be efficient in administration and improve the operation of private insurance markets.
125	I am an insurance agent located in Florida that specializes in Residential Condominium Association insurance. Over the last 5 years I have seen my flood insurance book on these properties diminish by 90% because of agents that offer flood rebate programs. I would like FEMA to put an end to this practice as it is setting your program up for a big fall when a major flood event occurs. These agents have captured most of the RCBAP business in Florida and cannot possibly handle the potential catastrophe claim, as they are having trouble just keeping up with proof of insurance requests. The consumer thinks he/she is getting a discount but time will tell the true value of the savings. Please, as you look to reform this program look into stopping the practice of rebating commissions.
126	I FINANCED 67,000.00 ON MY HOME AND AM PAYING ALMOST \$2200.00 A YEAR FOR FLOOD INS. COVERAGE. THIS IS CRAZY. THE FLOOD INSURANCE KEEPS GOING UP AND I AM FALLING BEHIND ON HOUSE NOTE.
127	I write the insurance for a condominium association that has 4 buildings, two are in the flood zone and 2 are not in the flood zone. Here is the rub; one of the buildings in the Flood Zone A and is valued at \$2.25 Mil. The annual premium for their Flood Insurance is \$2,452.00. The other building is in Flood Zone X, or not in the Flood Zone. That building is valued at \$1.75 Mil. The annual premium for this building is \$5,157.00. This is not a correct actuary's rate but some kind of hybrid. A good rate would encourage people that



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	are NOT in the Flood Zone to buy Flood Insurance and help subsidize the people who are in the Flood Zone. Any building or dwellings NOT IN A FLOOD ZONE should pay a lower rate than a building IN THE FLOOD ZONE.
128	<p>I suggest taking a look at the Zone A designation and break that down further. Several Zone A classed areas in my city have not flooded for 50 years or more and yet they are expected to pay the same Zone A insurance cost as someone in another Zone A mapped area that floods every 3 to 5 years. This is not equitable. It is why 90% of residents in my area make the correct claim that they are paying for others. The facts support their claim. A Solution would be to have a tiered insurance cost for those mapped in Zone A tied to the frequency of floods in those mapped areas.</p> <p>Another area of concern is the CRS program that rewards those most in danger. Some participants in the CRS program have a limited number of points they may collect simply because items to add points do not exist in their localities. Again rewarding those with known flood issues on the backs of those that have experienced few or no floods. To discuss further please contact me. Thanks for the opportunity to participate.</p>
129	<p>I was previously Federal Insurance Administrator and Texas Insurance Commissioner.</p> <p>We were very surprised to learn that we were not among the 175 "stakeholders" invited to your "listening session." given our long-standing interest in and criticism of the NFIP.</p> <p>For our complete comments, please attach a copy of my testimony before the Senate Committee on Banking, Housing and Urban Affairs, dated October 18, 2005.</p> <p>One of the serious problems you face are antiquated maps that mean hidden subsidies in flood insurance prices, unwise and unsafe construction being encouraged and people being misled into thinking they are outside the 100-year area when, in fact, they are not. FEMA's negligence in the map issue is a scandal.</p> <p>Another serious problem is the WYO program. WYO costs twice what your direct program costs and yet you hide the availability of the latter. Why do taxpayers have to subsidize insurance industry participants who are charging too much and whose claim services are rife with conflicts-of-interest?</p> <p>Consideration should be given to ending or severely altering the WYO approach. WYO insurers should be given skin in the game to reduce the conflicts and the insurers should have to compete on cost for market share. The NFIP could promulgate only pure premiums, not final rates, and the WYO insurers would advertise what additional charges they would have for a consumer considering a purchase. The "public option" of your direct program should also be part of that competition.</p> <p>Please refer to my Senate testimony for full details. I specifically request that that testimony be part of the record. If you need a copy, please contact me.</p> <p>Finally, I offer to meet with you to discuss the future of this much-troubled program. As a former head of the program, one faced with very similar problems as you face, I can help you. I think.</p> <p>Sincerely;</p>
130	To many times I am receiving calls from people who have gotten a letter from their mortgage company telling them they are now in a SFHA and must purchase insurance. Being a Pre-Firm building and being notified after the new map date, makes for a major problem. One solution I had is from the date of the

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	new map have the mortgage company send out their letter, but allow 60 days from the remapping date for Pre-Firm buildings to purchase flood insurance and be grandfathered. This way they have been notified and there are no more excuses.
131	Do you have material that I can use in flood presentation for 3 hours of c.e.
132	Why not just assist private insurance companies to lessen the unit cost of private flood insurance?
133	There is a huge conflict of interest with the flood service companies having a vested interest in some claims companies resulting in the exclusion of other adjusting companies that have equally good adjusters. The emphasis has always been in excluding coverage rather than helping the flood victims who pay the premiums. What an awful representation of government help.
134	Flood Map is vital. The Federal Gov. should be involved in bad Expertise in favor of the INS-COMP.
135	I BELIEVE THAT A PERSON WHO IS NOT REQUIRED TO PURCHASE FLOOD INS. SHOULD BE ABLE TO PURCHASE WHAT EVER AMOUNTS OF COVERAGE THEY DESIRE AND NOT BE REQUIRED TO PURCHASE FULL 80%COVERAGE LIKE THEY HAVE ON THIER HOMEOWNERS POLICY. I THINK THE POLICY SHOULD HAVE A FLAT AMOUNT FOR ADDITIONAL LIVING EXPENSE. STOP THE WYO;S FROM CHANGING THE REPORTING REQUIREMENTS THE FED FORMS GIVE THE ADJUSTERS TIME LIMITS AND THE WYO;S KEEP SHORTNING THE TIME LIMITS FOR REPORTING. NO SPECILA CONTRACTS WITH ADJUSTING COMPANIES. THE WYO'S AND SERVICE COMPANIES SHOULD HAVE TO DIVIDE THE LOSSES BETWEEN THE IA Firms AND GET THE LOSSES HANDLED WHY SHOULD ONE IA Firm get thousands of flood losses and another flood company not get any losses from that same event. Equal opportunity for all flood adjusting companies. Flood adjusters should have to go through one of the flood training schools and then get certified just because they have been doing adjusting for 4 years does make them a flood adjuster they need additional flood training.
136	<p>DEAR FEMA:</p> <p>I AM AN ATTORNEY FOR THE DRAINAGE DISTRICT FOR THE LARGEST POPULATION CENTER IN THE STATE OF LOUISIANA. ADDITIONALLY, I HAVE SERVED AS THE ATTORNEY FOR PARISHES, CITIES, ETC.</p> <p>ONE OF THE LARGEST PROBLEMS WITH FLASH FLOODING IS THE ILLEGAL INSTALLATION OF CULVERTS AND THE FILLING OF THE SWALE DITCHES WITH DIRT AFTER THESE SMALL CULVERTS HAVE BEEN INSTALLED WITHOUT THE PROPER ENGINEERING WORK TO CALCULATE SIZE OF CULVERT, ANGLE/DEGREE OF SLOPE OF CULVERT AND REQUIRED VELOCITY TO KEEP THE CULVERT FROM FILLING WITH SLUDGE. WHERE THIS IS PROHIBITED BY LAW, A HOMEOWNER SHOULD HAVE HIS CLAIM DENIED IF HE HAS CAUSED THESE CONDITIONS BY ILLEGALLY INSTALLING CULVERTS IN SWALE DITCHES RESULTING IN A LOSS OF WATER STORAGE CAPACITY AND INTERFERENCE WITH THE DRAINAGE FLOW. FURTHERMORE, OTHER HOMES IN THE SUBDIVISION THAT FLOOD BECAUSE OF THIS ACTION TAKEN BY ANOTHER HOMEOWNER SHOULD HAVE THE NFIP SUBROGATED TO THEIR RIGHTS TO RECOVER DAMAGES FROM THE HOMEOWNER ESTABLISHING THE ILLEGAL AND DETRIMENTAL CULVERT DRAINAGE PROBLEM. THANK YOU.</p>
137	<p>This program should be put in the hands of private insurers. The government should not be in the insurance business.</p> <p>Rather than just paying out for flood damage help the owners to prevent future flooding or move to an area where flooding doesn't occur. The goal is to correct a problem if possible not just throw money at it. This needs to be done in a way that shows concern for the individual and the problem they are experiencing.</p>



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138	I need to know a way to decrease my flood insurance which is more than my house insurance.
139	I have been forced to get flood insurance at \$200 more per month. My neighbors in front of me and to the side of me (about 10 ft apart) are LOMA. You guys are sitting on it while myself and others have to pay monthly for your government bureaucracy and the government wants to run health care. HA, they can't even run FEMA. FEMA is supposed to help not burden. I am not alone in this there are several households involved
140	I am living in an area that has never come close to flooding in over 100 years, yet I am being forced to carry flood ins. at the highest premium because I took out an SBA loan to fix my house after Hurricane Ike. I believe the corps of engineers needs to do a new survey of my area to access the true risks for flooding. Thank you.
141	The school was heavily damaged but not substantially damaged. Repairs include maintenance work not covered by PA program. The city cannot comply with its NFIP mandated Flood Damage Prevention Ordinance by issuing a permit for substantial improvements. The School District is stuck between complying with FEMA regulations as related to the NFIP but not being funded completely by FEMA.
142	I've heard some comments that FEMA may require everyone (even those whose property is not located in a high risk zone) to have a flood policy and I wholeheartedly disagree with that approach. Even though 25% of all flooding does occur in 'lower risk' zones, I do not want my premium to subsidize those who do choose to reside (or have their businesses) in higher risk zones. Thanks!
143	As a floodplain administrator for a small city with floodplains it is difficult to gain compliance or show the need for compliance here because so many properties here are NOT financed OR insured. Many are old homes or older manufactured homes. The threat of using 1316 even has no bearing when the effort does not equal results. There are no legal and cost effective means of compliance when dealing with cash sales and even some of our \$300K and up lakefront homes are being sold for cash to retirees. In an area where everything is financed I can see the program being much easier to work with.
144	By reading FEMA guidelines as to building storage in houses in v zones the builders, insurance agents and public are very confused. It is not realized that building to FEMA's specifications can result in an insurance bill double the regular insurance cost. For example a store room built with non load bearing beams and breakaway walls is specified by FEMA without making it clear to insurance underwriters and the public that it will double the insurance. Builders and mortgage companies and insurance agents should be aware of this problem. I speak from personal experience and it is a shock when the building is completed to learn that your flood insurance will be doubled.
145	The overall program is a good. I would have liked the deductible to be the same as last year, \$500.00 and not increased to the \$1000.00 deductible this year.
146	As a recent flood victim. Neither FEMA nor the Government should be in the grant business to flood victims, instead offer "lower cost" flood insurance to anyone who wants it. If you sum the FEMA grant money distributed to property owners, how much flood insurance would that have purchased?
147	I live in a home that has been a flood area since 1978 and has not had any flood claims. How often are areas reevaluated to determine if you are still in a flood zone?
148	This is my third attempt I hope that it doesn't get deleted Yes I strongly believe in the national flood ins program, I strongly feel that the program should be expanded to include natural disasters that affect Americans nationwide. There is most likely no area that is unaffected by disaster in one form or another. that being said I feel that any reconstruction incorporate design changes and more stringent building specifications and code i.e. flood prone areas elevate the new housing or raise existing houses this cost much less that you could imagine, encourage tongue and groove roofing in hurricane areas this will double the uplift, fire resistant shingles in wild fire prone areas, increase tie down in tornado

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	areas the list can be kept simple and goes if you want call me I can talk much faster than one letter at a time.
149	I sure would like to provide you with plenty of proof. I need to email someone with all my concerns. I need an email address, please to provide you with what I need to say. I am a FEMA national flood agency of 2003.
150	JESUS CHRIST WANTS TO BLESS AMERICA AND IN DOING SO BLESS THE WHOLE WORLD THAT WE POLICE! IF FEMA WOULD PAY ITS DEBTS? MY 2 DISASTERS AWAIT AWARD AFFECT! I AM A TELEMARKETER AND ONLY SELL WHAT I BELIEVE IN! YOU HAVE NOT BEEN FAIR TO ME IN THE PAST WHY SHOULD I HAVE GOOD THINGS TO SAY ABOUT THE FLOOD PROGRAM? SNAIL MAIL ME
151	Dear Sir, I support the NFIP program however for people who rebuild in a flood prone area after getting NFIP assistance it is my opinion they should only be allowed one claim per 25 years.
152	This is ONE of the BEST national initiatives the federal government has EVER offered tax payers! DO NOT CHANGE ANYTHING. If you had to change anything, make more homeowners buy this insurance or face tax penalties. This is especially critical for homeowners who rent their homes. If there is flood damage and the owner decides not to rebuild, then they have just forced a previously housed family onto the street - and at a time when homes are hard to find.
153	This is survey 101: make it easy for people to submit comments! The width of this box should be at least tripled! Or are you not serious about wanting comments?
154	An updated National Flood Policy should drive the eventual elimination of the National Flood Insurance Program. No new flood insurance policies should be made available for any new or rebuilt structure unless the project is above the 100 year flood plain. Any structure that puts in a flood claim - of ANY SIZE - should be required to build to the new/improved flood code (eliminate repeat flood claims). Put the burden on developers, homeowners in risky locations, and construction personnel to eliminate flooding risk, not the tax payers. (I recommend this as a survivor of the North Wall of Hurricane Andrew)
155	I live in a flood plain of 1 Foot, I pay 1219.00 per year for just flood, and my homeowner's premium is 259.00 per year. The property flooded in 1996, as this is when the property was flagged as needing flood insurance, I bought the house in 1997. It is outrageously expensive and my lender requires it. This whole program sucks and property needs to be better evaluated for risk to determine the real need for insurance.
156	How about if we stop building houses on known flood plains?
157	You issued a report or something in September that indicated that all of a sudden my daughter's home is now in a special flood hazard zone. Her insurance is now due to go up anywhere from 1300 to 2400 dollars a year, that's on flood insurance alone. Help! I have already written my congressman about this matter.
158	I would like to comment on my flood insurance. I feel it is completely ridiculous that flood insurance is so expensive. The cheapest I could find is \$1209 for the year with a \$5000 deductible which I couldn't afford if the house flooded. So I feel handcuffed. I do not have a body of water near my home, my property in back slopes away from the house as does the front. I really feel you should look closer at

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	your flood zones, my area had the wettest summer on record and there was not a drop of water in my basement. I'm a average worker just trying to support a family and I really feel I'm being cheated by this flood insurance. thank you
159	The price of Pre-FIRM policies have become beyond the means of many working class people. A recent report notes that there is about a \$1 billion subsidy of pre-FIRM rates per year but that didn't come to bite the NFIP until 2005. I believe that we need to maintain a pre-FIRM rate that is affordable and that to do so and maintain the fiscal integrity of the NFIP, there should be an overt subsidy into the program. This is still cheaper than structural flood protection.
160	<p>In an effort to save money, FEMA has announced that new final DFIRMs and is instead only passing out disks of map images and digital data. However there are many very small NFIP participating communities with part time staff and little computer expertise. In a few years, many of those communities will be unaware that they even have a map.</p> <p>There needs to be a mechanism to get paper maps to those small communities that still need them. There also needs to be a mechanism to print on demand for no or at least low cost for those with poor computer skills.</p> <p>The states do not have the extra resources to provide this service.</p>
161	<p>The maximum "insured" limit should be raised to either \$500,000 or actual value for individual home owners.</p> <p>Homeowners that have not submitted a claim should not be penalized for the repetitive loss claims that FEMA has paid out for the same property.</p> <p>More attention should be paid to repetitive loss claims and a limit should be placed on these particular properties. Maybe something like the life time limit in health insurance for certain conditions. Payment could also be made in the form of reimbursement so that actual repairs are made instead of the owner spending the money and continuing to live in unsafe and unhealthy conditions.</p>
162	As an Emergency Manager it appears that advertising of this insurance is minimal and many do not know it is available, or understand the need, as most current insurance policies will not cover flooding. Also the cost needs to be kept to a minimum in order for all to afford this coverage.
163	The current practice of not allowing that portion of a foundation vent to be considered that is above the BFE is counterproductive and actually works against freeboard requirements.
164	The NFIP should not pay for any risk it does not map! This includes erosion, flood-related mudslide, seismic related flooding, etc. Definition A-2 should be eliminated from all forms of the policy as being contrary to law. Suggest also that all carpet, whether installed or not be eliminated from coverage in all numbered and unnumbered A and V zones. Suggest that all maps where subsidence of control marks for Vertical Datum include a factor reflecting official USGS, Coast and Geodetic Survey, or other official data indicating that bench marks are in error. Suggest that not just floods (hydrological studies) but storms (meteorological phenomenon) also be reflected on all maps. In other words wherever surface runoff cannot escaped within 12 hours and rainfall of 12 inches or more may occur in any 24 hour period, that area should also be designated an A Zone! The exemption of watercourses experiencing less than 800 CFS during annual events, spring runoff vis a vis flood of record, not be exempt from mapping as A zones unless established that a flowage easement for up to 800 CFS exists and is adopted and enforced by the community.
165	The sessions were very productive in that a wide variety of stakeholders weighed in on various topics.



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	The positive tone and enthusiastic participation should lead to productive results.
166	Let me see the sense of this take away a FEMA trailer that is sitting on private property and put them in a house or apartment to rent for \$800.00 a month rent plus the deposit. That is from now till March 2010 then what if you don't make enough money to pay that a month. OH I know we are not Katrina victims I remember now the only disaster in America was Katrina. Ike was just an inconvenience since then entire town was flooded except 14 houses.