

## APPENDIX H

### CRS & FEMA Mitigation Planning Program Overview

Over the last year, the Community Rating System has issued new guidance associated with participation in the program. This guidance places an increased burden on communities to not only carry out activities required under the program, but to maintain detailed records regarding these efforts. Moving forward, communities will need to be diligent in maintaining these records in an effort to maintain their respective program rating. The schedule of activities, as stated, remains unchanged as follows:

- o Public Information Activities (300 Series)
- o Mapping and Regulations (400 Series)
- o Flood Damage Reduction Activities (500 Series)
- o Warning and Response (600 Series)

Each of these series involves a range of activities intended to alleviate the exposure of repetitive loss properties (RLP) in the event of a natural disaster. A majority of these activities is familiar to participants in the program. There are some modifications; however, the most significant change involves Section 500, specifically Section 510, which deals with Floodplain Management Planning requirements. The Section 510 guidance impacts communities based on the number of repetitive loss properties present in a respective jurisdiction. The following provides an overview of how the 510 guidance impacts communities with varying numbers of RLP's:

- (1) Category A: A community that has no repetitive loss properties, or whose repetitive loss properties all have been mitigated. A Category A community has no special requirements except to submit information to update its repetitive loss list, as needed.
- (2) Category B: A community with at least one, but fewer than 10, repetitive loss properties that have not been mitigated. At each verification visit, a Category B community must:
  - (a) Prepare a map of the repetitive loss area(s)
  - (b) Review and describe its repetitive loss problem
  - (c) Prepare a list of the addresses of all properties with insurable buildings in those areas
  - (d) Undertake an annual outreach project to those addresses. A copy of the outreach project is submitted with each year's recertification.
- (3) Category C: A community with 10 or more repetitive loss properties that have not been mitigated. A Category C community must:
  - (a) Do the same things as a Category B community
  - (b) Prepare a floodplain management plan or area analysis for its repetitive loss area(s).

The overriding concerns regarding the updated CRS guidance relate to Section 510 Floodplain Management Planning. For communities classified as Category C above, a Floodplain Management Plan in line with Section 510 must be drafted and adopted by their respective Governing Board. The following outlines the steps prescribed under Section 510, and the content and process required for varying levels of compliance:

**Step 1: Organize to Prepare the Plan**

- A. (4 Points) If the office responsible for the plan participates in development (minimum of five meetings)
  - B. (9 Points) If the planning process involves a committee (minimum of five meetings)
  - C. (2 Points) If governing board recognizes the committee
- (15 Points) Step 1 Total Available Points**

**Step 2: Involve the Public**

- A. (Up to 60 Points) If the planning process is conducted through a planning committee that involves the public and meets the following requirements:
    - Committee includes staff and at least half of the members are not staff;
    - Committee must meet a minimum of five times; and
    - Adequate participation is required.
  - B. (15 Points) If one or more of the plan meetings are held in an affected area within two months of initiation of the process.
  - C. (15 Points) If a meeting is held in an affected area at the end of the process, two weeks prior to adoption.
  - D. (5 Points)  
(30 Points Max) For each additional public outreach measure as follows:
    - Establish a website dedicated to the plan;
    - Conduct a public webcast regarding the plan;
    - If a questionnaire involving the community is conducted (double credit is provided if the survey is direct-mailed to residents in flooding hotspots); and
    - Additional outreach, such as mailers, booths at events, and presentations to civic groups and neighborhoods.
- (120 Points) Step 2 Total Available Points**

**Step 3: Coordinate**

- A. (5 Points) Required for credit under Step 3: The community must review all past plans, studies, and technical information pertinent to floodplain management.
  - B. Communities will receive credit for reaching out to other agencies:
    - Contact agency, keep records;
    - Ask agency if they have useful data;
    - Ask agency if they have information pertinent to project; and
    - Offer the agency an opportunity to participate in plan.
    - (1 Point) For each agency contacted.
    - (2 Points) For follow-up contact.
- (35 Points) Step 3 Total Available Points**

**Step 4: Assess the Hazard**

- Item A, below, must be completed.
- B-rated & C-rated communities must assess all repetitive loss areas

A. Communities must assess the flood hazard locally including:

- Special Flood Hazard Areas (SFHA);
- Repetitive Loss Areas (RLA);
- Areas not in SFHA, but with flood history; and
- Other flooding hotspots.

(5 Points) If SFHA's are mapped

(5 Points) For a description of flood hazards

(5 Points) For a discussion of past floods

**(15 Points) Total Available Points**

B. Communities must:

- Include an analysis of less frequent flood areas including
  - Inventory of dams,
  - Inventory of levees, and
  - Mapping Coastal A zones
- Map all affected areas
- Summarize hazards in lay terms.

**(10 Points) Total Available Points**

C. (5 Points) For including a discussion of potential flooding areas

D. (5 Points) For providing probability of future events

**(35 Points) Step 4 Total Available Points**

**Step 5: Assess the Problem**

- Item A, below, must be completed.
- Assessment must truly characterize causes of flooding in the areas identified in Step 4.
- Multi-jurisdictional plans require an assessment of problems in all communities.

A. (2 Points) If community's vulnerability to all identified hazards is assessed.

B. Communities must incorporate an assessment of how the following are impacted by hazards:

(5 Points) For life safety and evacuation;

(5 Points) For public health;

(5 Points) For critical facilities;

(5 Points) For economic impacts;

(5 Points) For the number and types of affected buildings.

C. (5 Points) If the assessment includes a review of historical damage, including RLA's.

D. (5 Points) For a review of the natural environment.

E. (7 Points) For a review of past, present, and future development trends

F. (8 Points) For a description of potential future flooding conditions

**(52 Points) Step 5 Total Available Points**

**Step 6: Set Goals**

The community must set goals aimed at addressing all hazards identified in Step 4.

**(2 Points) Step 6 Total Available Points**

**Step 7: Review Possible Activities**

Item A, below, is required.

Under Step 7, a review of possible activities must:

- Include a discussion of funding availability;
- Include an assessment of activities that are/are not working;
- All activities defined in previous plan updates must be included

A. (5 Points) If the plan reviews existing zoning, building, stormwater regulations, etc.

This plan must:

- State how tools can reduce flooding;
- Outline existing plans and regulations; and
- State whether amendments are necessary.

(5 Points) If the community assesses whether current regulations are sufficient for current and future development conditions.

(5 Points) If property protection mechanisms are discussed (i.e., elevation).

(5 Points) If protection of natural functions is discussed.

(5 Points) If emergency service activities are discussed.

(5 Points) If the plan reviews structural projects (i.e., channel maintenance and dams)

(5 Points) If the plan reviews public outreach activities.

**(35 Points) Step 7 Total Available Points**

**Step 8: Draft Action Plan**

For each recommendation, the plan must state:

- Who is responsible;
- When it will be done;
- How it will be funded;
- Actions must be prioritized;
- If acquisition, the community must discuss logistics;
- Communities must adopt action items under two of the six categories defined by CRS (See Figure 510-4, CRS Manual);
- Plan must state how community will incorporate the proposed activities and recommendations into existing plans, studies, and regulations.

A. (10 Points) If the plan provides flood recommendations for two of the six categories defined in Step 7 (Figure 510-4, CRS Manual).

(20 Points) If the plan provides flood recommendations for three of the six categories defined in Step 7 (Figure 510-4, CRS Manual).

(30 Points) If the plan provides flood recommendations for four of the six categories defined in Step 7 (Figure 510-4, CRS Manual).

(45 Points) If the plan provides flood recommendations for five of the six categories defined in Step 7 (Figure 510-4, CRS Manual).

B. (10 Points) Additional points provided if the action plan proposes post-disaster redevelopment and mitigation procedures.

C. (5 Points) Additional points provided if the plan action items address other natural hazards.

**(60 Points) Step 8 Total Available Points**

**Step 9: Adopt the Plan**

(2 Points) If the plan is adopted by the Governing Board by formal vote and resolution.

**(2 Points) Step 9 Total Available Points**

**Step 10: Implement, Evaluate, and Revise**

- The plan must address when, how, and by whom the plan will be implemented;
- An annual status report must be submitted to CRS;
- Every participating community must submit reports; and
- Plan must be updated on a five-year cycle.

A. (2 Points) If the community established formal procedures for monitoring and updating.

B. If the annual evaluation report is produced through the steering committee appointed under Step 2(a).

(6 Points) If the committee meets once a year.

(12 Points) If the committee meets twice a year.

(24 Points) If the committee meets quarterly.

**( 26 Points) Step 10 Total Available Points**

**(382 Points) Total Available Points for Section 510, Floodplain Management Plan.**

Once a plan is in place and in compliance with the Section 510 requirements outlined above, the document must be updated every five years. The updated plan must be submitted to CRS for review. The CRS audit of the plan will be based on the guidance in place when the plan is completed. For CRS communities participating in the Pamlico River Basin Regional Hazard Mitigation Plan, this means that following completion of this plan, if intended for CRS compliance, the plan will be reviewed under the standards outlined above.

*Repetitive Loss Area Analysis (RLAA)*

As an alternative to the requirement to conduct a Floodplain Management Planning Process, communities may prepare a Repetitive Loss Analysis (RLAA). It should be noted that the RLAA provides a potential point total of 140 points, where the FMP planning process provides the potential for securing 382 points. The RLAA involves a five-step process. The process is briefly summarized below. For further detail refer to Section 512.b of the CRS guidance manual.

Step 1: Directly advise all properties located in defined repetitive loss areas that the analysis will be conducted and solicit their input.

Step 2: Contact agencies that may have plans and studies that could affect the cause or impacts of flooding.

Step 3: Visit each structure in all repetitive loss areas and collect basic information as defined under Section 512.b., Step 3.

Step 4: Review alternative approaches and determine what protection measures and drainage improvements are feasible in the community.

Step 5: Document findings for each defined repetitive loss area.