



FACTSHEET

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NFIP/CRS Corner

Addendum to the CRS Coordinator's Manual Expected in 2021

The CRS will not issue a full new edition of the *Coordinator’s Manual* in January 2021, as described in the last few issues of the NFIP/CRS Update newsletter. Instead, the CRS will be issuing a brief “addendum” that communities will use in conjunction with the current 2017 *Coordinator’s Manual*. The Addendum will serve as a “bridge” between the existing guidance materials and the more comprehensive update that is anticipated to be needed when FEMA continues to implement the National Flood Insurance Program (NFIP) Transformation.

This approach will allow CRS communities to continue using the familiar materials for a longer period. It also should minimize the possibility for a shortened turnaround time and/or the need for interim guidance—either of which could prove disruptive for communities.

Beginning in January 2021, CRS communities will be implementing their programs in accord with both the 2021 Addendum and the 2017 *Coordinator’s Manual*. This will continue until the next full update of the *Coordinator’s Manual*, which is not expected until 2023.

The Addendum will be a short document, limited in scope to clarifications, simplifications, new credit opportunities, and FEMA initiatives. Highlights of CRS program changes that will be part of the Addendum, including CRS credit opportunities for floodplain species assessments and management plans for potential substantial damage, will be discussed in the next issue of the newsletter. An additional change expected in the Addendum is a new prerequisite for achieving Class 8—enforcement of a freeboard standard for residential buildings. At verification cycle visits after January 2021, a CRS community will be required to enforce at least 1 foot of freeboard for all new and substantially improved residential buildings in its numbered A and V Zones in order to become (or remain) a CRS Class 8 or better community. Communities that do not implement freeboard will be limited to a CRS Class 9 rating. More details on when communities will need to be implementing freeboard for residential buildings will be included in the next edition of the newsletter.

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NFIP/CRS Corner (cont...)



Addendum to the CRS Coordinator's Manual Expected in 2021 (cont...)

The CRS Task Force has been examining the value and feasibility of a freeboard prerequisite at the request of Federal Insurance & Mitigation Administration (FIMA) [see article on pages 3-4 of the [June/July 2018](#) issue of the NFIP/CRS Update]. This past year, the CRS Task Force’s Freeboard Prerequisite Committee recommended including the prerequisite in the CRS and FIMA has concurred.

All communities that implement a freeboard requirement will receive CRS credit under Activity 430 (Higher Regulatory Standards), and this is also an opportunity for communities to consider whether a 2- or even 3-foot freeboard standard would be appropriate for them.

Many Pluses of Freeboard

Already, almost 80 percent of all CRS communities implement at least 1 foot of freeboard, realizing that elevating structures is one of the best ways to reduce flood damage. In addition,

- (1) Property owners receive lower insurance rates when their building conforms to a freeboard requirement, because the extra level of elevation reduces the structure’s flood risk.
- (2) Communities earn CRS credit for implementing freeboard, which translates into a CRS premium discount for their policy holders.
- (3) Freeboard standards result in reduced flood losses:
 - Freeboard as credited under the CRS (at least 1 foot) is one of the floodplain management measures found to have statistical significance in reducing flood losses, according to a 2015 study by Texas A&M University;
 - A study conducted by FEMA Region VIII after the 2013 floods in northern Colorado showed that losses would have been 30 percent higher had existing freeboard standards not been in place, and that the reduction in losses would be even greater in a larger, 100-year flood.
- (4) The freeboard prerequisite supports the three goals of the CRS: reduce flood losses, support the insurance aspects of the NFIP, and foster comprehensive floodplain management.

More information will be coming in future newsletters. ≡ ≡ ≡

(Taken from the NFIP/CRS Update Newsletter, February/March 2020 Edition)

Special Announcement on New Elevation Certificate Form

On February 21, 2020, FEMA issued a [new Elevation Certificate](#) form. The form date is December 2019 with an expiration date of November 30, 2022. It is the same form as the previous form, with no new or altered fields. Only the form date and expiration date have changed. Per FEMA guidelines, a transition or “grace” periods for new Elevation Certificate forms is no longer provided. Therefore, any Elevation Certificates signed and dated February 21, 2020 or later must be on the new form. FEMA may come out with new guidance on this, but as of right now, if an Elevation Certificate that is dated February 21, 2020 or later is reviewed for CRS purposes and it is not on the new form, it will be considered an error.

Also be advised that, with the introduction of this new form, a new field is now required to be filled out for CRS purposes. Field A4 Building Use is now mandatory. We will be checking to make sure the blank is filled in and filled in accurately. For example, if the building is clearly non-residential, but A4 is marked, “residential,” we would consider this an error. Because we cannot always determine the use of the building by looking at the Elevation Certificate or your Permit List, we will be fairly lenient when applying this error. However, leaving this field blank will clearly be an error. ≡ ≡ ≡



About the Emergency Management Institute

FEMA's EMI in Emmitsburg, Maryland, offers training on topics related to floodplain management, mitigation, and construction, including the basic CRS course (E0278). These are oriented to local building, zoning, planning, and engineering officials. Tuition is free for state and local government officials, travel stipends are available, and on-campus lodging is free. Free transportation is provided from the airport to the campus and back to the airport. The only out-of-pocket expense is a meal ticket—all-you-can-eat breakfast, lunch and dinner. Go to the welcome of the EMI website for specific details. The application to attend can be found on this page on the EMI website, or call EMI at (800) 238-3358 or (301) 447-1035. Signed applications should be submitted through the state's Emergency Management Training Officer. ≡ ≡ ≡

(Taken from the NFIP/CRS Update Newsletter dated February/March 2020)



CONGRATULATIONS!

...To **Jenn Rachal** for her new position with ISO/CRS. With a heavy heart, we said goodbye to her back in December. She will be missed, but we may still be working with her through the CRS Program.

AND

...To **Jeanette Clark**, for her new position at LaDOTD—Floodplain Management Section. She replaced Jenn, and comes to us from the City of Denham Springs.





National Flood Insurance Program Transition in Flux

The flood insurance market in the United States is in a state of transition, as *Insurance Business* reports. Following hurricanes Harvey, Irma, and Maria in 2017, and Hurricane Florence in 2018 – and the flood insurance landscape has changed. The Federal Emergency Management Agency (FEMA) and state legislators across the country are pushing for private flood insurers to get more involved in the marketplace in order to supplement the coverage the NFIP can provide.



“Greater risk distribution is beneficial to everybody, and we’re starting to see legislation that is pushing to allow that to happen,” explained Brad Turner, National Product Manager, Flood, Burns & Wilcox. “The flood insurance market is in a state of transition, where the private market is becoming much more heavily involved. That’s not just the case in the excess space; a lot of private flood insurers are proactively marketing what they can do in comparison with the NFIP, which is great. When there’s healthy competition in a segment, not only does it benefit the consumer, but it also benefits the markets by forcing them to take a step forward, to enhance their underwriting techniques, and to incorporate new methodologies to enhance precision.”

“We’re definitely starting to see a transition towards a more competitive flood insurance marketplace,” Turner added. “The markets, backed by supportive legislation, are using new underwriting techniques and technology to underwrite flood risks more proactively, and they’re seeing some success. The NFIP remains the primary source of flood insurance for many insureds, but you’re starting to see more people proactively seeking out private flood as a viable alternative option. It’s an encouraging time to be in flood insurance.”

In a new report from FEMA and the Office of the Flood Insurance Advocate (OFIA), the agency shared how it is planning on reducing the complexity of the National Flood Insurance Program. The report details several areas of customer frustration related to the NFIP that warrant a systemic solution.

“FEMA’s strategic goals established in 2018 remain in place to build a culture of preparedness, ready the nation for catastrophic disaster, and reduce the complexity of FEMA programs, particularly the NFIP,” said David Stearrett, FEMA Flood Insurance Advocate. “FEMA’s component, the Federal Insurance and Mitigation Administration (FIMA), remains committed to “moonshot” targets set to achieve these goals by doubling the number of structures covered by flood insurance and increasing investment in mitigation four-fold by 2023. The growth in the private flood insurance market furthers the target of doubling flood insurance coverage.” ≡ ≡ ≡

(Taken from DSNews, Daily Dose)

NFIP/CRS Class 8 Freeboard Prerequisite FAQ (cont...)

How will the change in the 2017 CRS Coordinator's Manual be made?

FEMA will issue an addendum to the 2017 CRS Coordinator's Manual that will be effective on January 1, 2021. CRS communities and the Insurance Services Office, Inc. (ISO) will continue to use the 2017 Coordinator's Manual along with the 2021 Addendum, until such time that FEMA issues a new Coordinator's Manual, likely not before 2023

Which CRS communities does the Class 8 freeboard prerequisite affect?

The Class 8 freeboard prerequisite affects Class 5 through Class 8 communities. The prerequisite will not affect Class 9 communities. Communities in Classes 1 through 4 already meet the new freeboard prerequisite.

When will the Class 8 freeboard prerequisite be applied to participating CRS communities?

The Class 8 freeboard prerequisite will be required of CRS communities at their first CRS cycle verification visit after January 1, 2021. Ordinance, regulatory, or building code language that meets the Class 8 prerequisite must be adopted, and provisions must be enforced, no later than the first cycle visit after January 1, 2021. However, an earlier date for community enforcement of the Class 8 freeboard prerequisite may be required in a new (2023 or later) CRS Coordinator's Manual. This means that communities that are not due for a cycle visit until 2023 or later should not wait to adopt the freeboard requirement.

Can a community still join or participate in the CRS without a freeboard requirement?

Yes. Any community that meets the CRS Class 9 prerequisites can apply to join the CRS and become a Class 9 community. Any already-participating CRS community that cannot meet the Class 8 freeboard prerequisite at its first cycle visit after 2021 will change to a Class 9 community (see previous question).

Where must a community require at least 1 foot of freeboard?

Communities must enforce the freeboard requirement for all residential buildings that are new, substantially improved, and/or reconstructed due to substantial damage throughout the SFHA where base flood elevations have been determined on the FIRM or in the FIS. This means all "numbered zones" in the SFHA. The CRS will not require freeboard in unnumbered zones within the SFHA.

The prerequisite includes all residential buildings. Does this include manufactured homes?

Yes. At least 1 foot of freeboard is required for manufactured homes, including equipment and mechanical items.

NFIP/CRS Class 8 Freeboard Prerequisite FAQ (cont...)

If a community adopts the International Code Council codes, will they meet the requirements for the Class 8 freeboard prerequisite?

Yes, provided that the adopted building code includes freeboard for residential buildings and the community is enforcing the freeboard provisions. This includes adopted state building codes that are enforced in the community. The CRS credits other higher standards included in building codes. For example, coastal CRS communities that have adopted and enforce recent building codes and have newer FIRMs often can qualify for Coastal A Zones credit under Activity 430 (Higher Regulatory Standards).

Should a community require more than one foot of freeboard?

All communities are encouraged to consider adopting additional freeboard. This may mean freeboard in all flood zones. It may mean more than 1 foot of freeboard. It may mean applying the freeboard standard to all building types. Remember, CRS credit is available for the enforcement of freeboard under CRS Activity 430 (Higher Regulatory Standards).

Will communities receive CRS credit for the enforcement of freeboard for residential buildings?

Yes. Communities will continue to receive freeboard credit (FRB) under Activity 430 (Higher Regulatory Standards) for enforcing freeboard for residential buildings. Communities that already receive FRB credit will continue to receive FRB credit. The basic FRB credit in the CRS is 100 points. FRB credit is higher when more freeboard is required or when elevation on fill is not allowed. An impact adjustment is applied to FRB credit.

What should CRS communities do in light of the Class 8 prerequisite?

Communities that currently enforce freeboard should check their floodplain ordinances and/or building codes to be sure that equipment and mechanical items are included, that substantially improved buildings are included, and that the provisions are being enforced. Communities that do not currently enforce at least 1 foot of freeboard for all new or substantially improved residential buildings, including equipment and mechanical items, within numbered zones of the SFHA will need to make changes to their floodplain ordinance and/or building code. Adoption and enforcement of the freeboard must occur before the community's first CRS cycle visit after January 1, 2021.

What if a community has questions about the Class 8 prerequisite or the CRS?

A community should contact its ISO/CRS Specialist with questions about the prerequisite and the CRS. A list of ISO/CRS Specialists can be found on the CRS Resources website (CRSresources.org). State NFIP Coordinators or FEMA Regional CRS Coordinators can assist with model ordinance or sample regulatory language for freeboard, and other higher regulatory standards. Contact information for FEMA is available at the FEMA website (www.fema.gov). ≡ ≡ ≡

2020 Hurricane Names

Arthur

Bertha

Cristobal

Dolly

Edouard

Fay

Gonzalo

Hanna

Isaias

Josephine

Kyle

Laura

Marco

Nana

Omar

Paulette

Rene

Sally

Teddy

Vicky

Wilferd

*The State NFIP Office wants
to wish everyone a safe and
happy holiday!*

Sincerely,

*Cindy, Pam, Susan, &
Jeanette*

***HAPPY
BIRTHDAY
AMERICA!!***



FLOODPLAIN MANAGEMENT



As the State Coordination Office between the DHS/FEMA Regional Office and the communities of Louisiana that belong to the National Flood Insurance Program [NFIP], it is our job to provide any guidance or assistance needed to our Louisiana communities in order to assure the NFIP regulations are carried out and violations prevented. In order to better serve you, please take a moment to tell us how we're doing and how we could improve. Thank you,

Cindy O'Neal, CFM – Pam Lightfoot, CFM – Susan Veillon, CFM – Jeanette Clark

CUSTOMER SERVICE SURVEY

Have you had contact with our office within the last 6 months? YES NO

if yes, please check one: Email Phone Meeting

(please circle a number)

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Staff was friendly and courteous	5	4	3	2	1
I was treated with respect	5	4	3	2	1
Staff was knowledgeable	5	4	3	2	1
My questions & concerns were addressed in a timely manner	5	4	3	2	1
The staff provided me with useful information	5	4	3	2	1
I had an overall positive experience dealing with the staff of Floodplain Management	5	4	3	2	1

How could we improve our services?

PLEASE MAIL completed survey to:

LADOTD Floodplain Management - Section 64

P.O. Box 94245

Baton Rouge, LA 70804





Our goal is flood loss reduction . . .

LOUISIANA DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT

If you or someone you know would like to receive future copies of this newsletter please contact our office:

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