



FACTSHEET

March 2021

Issued quarterly by the Louisiana Dept. of Transportation & Development Floodplain Management Section

Volume 21 - Number 1

Staff Contacts:

Patrick J. Landry, P.E.
Chief, Public Works & Water
Resources Division

Cindy O'Neal, CFM
Manager and Editor-in-Chief

Pam Lightfoot, CFM, Editor
Susan Veillon, CFM
Jeanette Clark
National Flood Insurance Program
Coordinators
[225] 379-3005

The LOUISIANA FLOODPLAIN
MANAGEMENT *FACTSHEET* is
published through assistance
provided by FEMA under the
Community Assistance Program -
State Support Services Element of
the National Flood Insurance
Program (NFIP). The contents do
not necessarily reflect the views
and policies of the Federal
Government.



NFIP/ CRS Corner

The 2021 Addendum to the 2017 CRS Coordinator's Manual

The [2021 Addendum to the 2017 CRS Coordinator's Manual](#) The 2021 Addendum to the 2017 CRS Coordinator's Manual is now available. The Addendum will be used by communities in conjunction with the current Coordinator's Manual. It will serve as a "bridge" between the existing guidance materials and the more comprehensive update that is anticipated to be needed when FEMA implements NFIP transformation. Page A-4 of the Addendum explains, "How to Use the 2021 Addendum." It says:

This Addendum material is presented in an order that corresponds to the 2017 Coordinator's Manual. Only those sections of the Coordinator's Manual that are being changed appear in this Addendum. Each section begins with a short summary of the changes for that section. This is followed by a series of bulleted entries that identify the section or subsection and page number in the 2017 Coordinator's Manual at which the change is to be incorporated. Significant changes in each section are listed first, followed by more minor corrections, if any, most of which are needed to make other parts of the Coordinator's Manual consistent with the new language (such as renumbering where a new subsection has been inserted, or a implementing a change in terminology). Those portions of the 2017 Coordinator's Manual that are not included in this Addendum remain unchanged. The Index and Appendices have not been updated.

For the convenience of communities, the new inserts and the replacement language are presented mostly as one or more full paragraphs, rather than as word-by-word changes. This makes it possible for the community to more easily incorporate the new material into whatever format it uses.

Inside this issue:

NFIP/CRS Corner	1-3
Taking a Look at Floodproofing for Machinery & Equipment	4-5
Order Erased by Trump Could Help Biden Address Rising Seas	6
Save the Dates	7



NFIP/CRS Corner (cont...)



The 2021 Addendum to the 2017 CRS Coordinator's Manual (cont...)

The 2021 Addendum includes two new prerequisite requirements, several new CRS credit opportunities, and some updates and modifications aimed at simplifying credit and reporting requirements. A collection of frequently asked questions about the Addendum are also available at [fema.gov/community-rating-system](https://www.fema.gov/community-rating-system) and recently the FAQs for the [new Class 8 Freeboard Prerequisite](#) have been updated. The updates to the Class 8 Freeboard Prerequisite FAQs are the result of new questions asked by stakeholders regarding manufactured homes, historic homes, machinery and equipment, and attached garages.

For the changes in the Class 9 prerequisite for Elevation Certificates and other construction certificates, a template for written construction certificate management procedures is available at CRSResources.org/300-3/. The template will help a community produce a document that describes the manner in which its office collects, reviews, corrects, and maintains the certificates, and how they are made available to inquirers.

Guidance materials for new credit opportunities will be available in the coming weeks. They will include information on how to develop floodplain species assessments and floodplain species plans for natural functions plan credit under Activity 510 (Floodplain Management Planning), and how to develop a plan for the management of substantial damage.

Webinars in the [CRS Webinar Series](#), and recordings of CRS webinars will continue to focus on the 2021 Addendum. ≡≡≡

(Taken from the NFIP/CRS Update, December 2020/January 2021 Edition)

Construction Certificate Management Procedures

One of the changes in the 2021 Addendum to the Coordinator's Manual is a new element CCMP, construction certificate management procedures, under Activity 310 (Elevation Certificates). This element replaces the current EC element and will be worth the same number of credit points. In addition, credit for this element became a Class 9 prerequisite beginning in January 2021 when the 2021 Addendum became effective.

Written procedures are important to the community and to the CRS because they address what certificates the community requires for development in the floodplain and how that community collects, reviews, corrects, maintains, and makes available the floodplain-related construction certificates required by the CRS. These floodplain-related construction certificates include the Elevation Certificate, Floodproofing Certificate for Non-Residential Buildings, Residential Basement Floodproofing Certificate, V Zone design certificate and engineered opening certificates. Previously, CRS communities were required to submit a written description of how the community maintains, stores, and provides copies of certificates to inquirers.

For credit for element CCMP, a community will need to expand its current construction certificate maintenance procedures to cover the collection, review, and correction process, and require staff to follow these official internal procedures. Also, the procedures will be required to be approved by the head of the department who oversees the staff and duties involved in the procedures. This could mean multiple department heads will be approving these procedures if multiple departments are involved in the procedures. The department head(s) must see the procedures and place their signature on the document for it to be considered "approved."

[continued on next page]



NFIP/CRS Corner (cont..)



Construction Certificate Management Procedures (cont...)

Accurate and readily available data on a building's flood zone, elevation, and other construction information are essential to insurance agents for processing an application for a flood insurance policy. Such information not only contributes to accurate insurance ratings, but also helps determine whether buildings are compliant with NFIP requirements.

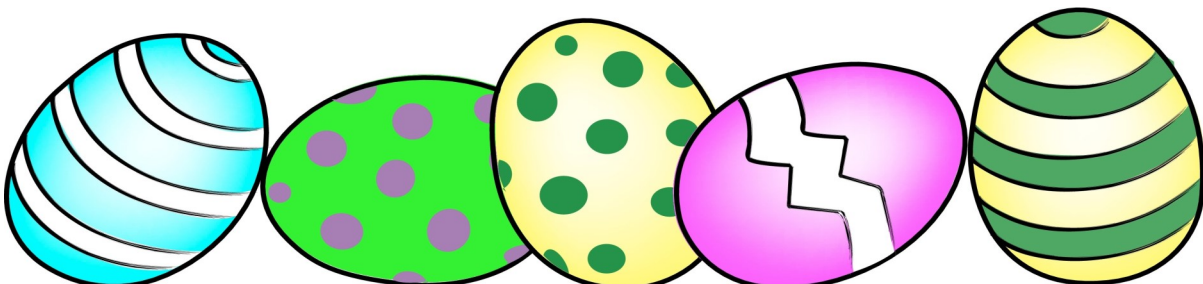
The CRS wants to be sure everyone knows what the procedures are and follows them so all construction certificates get collected, reviewed, corrected, and maintained appropriately for CRS standards. Formal written procedures, when followed, will assist communities to reach the desired outcome of 90% accuracy needed to maintain participation in the CRS. These procedures are also a Class 9 prerequisite under the 2021 Addendum.

A community's construction certificate management procedures for element CCMP are evaluated only at cycle time. A community must receive credit for this element to meet the amended Class 9 criteria in the 2021 Addendum. This is an "all-or-nothing" element, meaning there will be no proration of credit. The Addendum specifically lists the required items to cover in the procedures. To receive the full 38 points for this element, a community must make sure that it adequately covers all of the required topics. A [CCMP template](#) has been created to guide communities in generating their written management procedures. CCMPs are required for all cycles started after January 1, 2021. ===

(Taken from the NFIP/CRS Update, December 2020/January 2021 Edition)

[NFIP LinkedIn page launched](#)

You can now stay current on NFIP updates with the new NFIP LinkedIn page, which will be used to help advise, advocate, connect, and grow the business of flood insurance. Follow the page to access flood insurance educational information, join conversations on improving the business of flood insurance, strengthen existing industry partnerships, and connect with non-traditional partners such as non-profits serving vulnerable communities. [Follow the page here.](#)





Taking a Look at Floodproofing for Machinery and Equipment

By Rebecca Quinn, CFM

Over the past several months there's been a lot of talk, and considerable consternation, about "machinery and equipment" and utility meters. The discussion was prompted by the prerequisites established by FEMA for the NFIP Community Rating System that, starting with CRS communities that have their cycle visits in 2021, requires communities to adopt at least one foot of freeboard above the base flood elevation to obtain or retain a Class 8 rating or better. Check out the [Class 8 Freeboard FAQs](#). Applying freeboard to the lowest floor is easy; it's even in the 2015 and later editions of the International Residential Code (although a few states remove the freeboard). But what about machinery and equipment?

Among other minimum requirements, NFIP communities must require new construction and substantial improvements to "be constructed by methods and practices that minimize flood damages, and (iv) be constructed with electrical, heating, ventilation, plumbing, and air conditioning equipment and other service facilities that are designed and/or located so as to prevent water from entering or accumulating within the components during conditions of flooding" [44 CFR § 60.3(a)(3)(iv)]. I added the italics to emphasize the rule doesn't explicitly say "elevated to or above the BFE." This rule was adopted in August 1986.

In the very early days, when the NFIP was administered by the U.S. Department of Housing and Urban Development, the requirements were even squishier, with the expectation that applicable state and local building codes and health regulations would "provide for the protection of the heating system and other critical mechanical or electrical installation from damage by flooding" [24 CFR § 1910.58(c)]. That changed in September 1971 to require use of "construction materials and utility equipment that are resistant to flood damage" and language similar to the current requirement appeared in the section for subdivisions, requiring a list of public facilities and utilities to be "located, elevated, and constructed to minimize or eliminate flood damage."

Let's take a look at what "designed" and "located" mean. "Located" is readily interpreted to mean elevated. But the design part? That's what we call a "performance statement" or expectation – it describes the expected performance without saying explicitly how to achieve it. "Designed ... so as to prevent water from entering or accumulating within the components" is fairly well understood to mean the equipment, by its very nature, can be submerged and subsequently restored to function with "minimal" cleaning and repair (similar to what is expected of flood damage-resistant materials). That means typical, off-the-shelf equipment does not meet that expectation. Here's where common lingo can get in the way – equipment that meets that expectation is not "floodproofed" in the same sense that buildings are designed to be dry floodproofed.

When you take a look at the CRS Class 8 FAQs, look for Question 16, The answer explicitly says the freeboard requirement "includes machinery and equipment placed within attached garages and/or within enclosures below elevated buildings, with the exception of utility meters and equipment specifically designed to withstand inundation." The answer goes on to say a community that "allows floodproofing around machinery and equipment in lieu of elevation to the freeboard level does not meet the prerequisite." Remove the word freeboard, and that's a good answer for minimum NFIP requirements and reinforces that the equipment itself must meet the performance expectation.



Taking a Look at Floodproofing for Machinery and Equipment (cont...)

Now, what about utility meters? This has been a question for a long time. I wrote about electric meters in the [November 2009 Insider](#). Most electric, gas, and water meters are owned by the utility companies, and most utilities are regulated by a public service commission or similar state agency. For the most part, this means regulating installation of meters is not within the jurisdiction of communities. I think there's been a vague expectation that state floodplain folks would somehow be able to get public service commissions to impose requirements to minimize flood damage. When I was Maryland's NFIP State Coordinator many years ago I was not so gently "waved away" from starting that conversation with the public service commission. I am aware, however, that some electric companies have guidelines for meters in SFHAs. My guess is they elevate meters because it speeds up their own recovery and service to customers, not because a state entity imposes rules.

Let me tie together two things by telling you about an email exchange I had recently with someone who reads my Notebook columns. He explained he'd been "gigged" by the ISO CRS specialist because an Elevation Certificate showed the gas meter for a building below the BFE. The Elevation Certificate originated as a data collection tool to help the NFIP properly rate flood insurance policies. Over the past decade or more, the EC has changed to be more useful as a compliance tool because information about buildings is collected along with surveyed elevations. But keep in mind, surveyors only survey what they see. They cannot determine compliance, and they certainly cannot tell if equipment is specially designed to meet the performance expectation to be below the BFE.

The floodplain administrator who got in touch said he checked [FEMA P-348 Protecting Utility Systems from Flood Damage](#) (2017), and found little about utility meters. I mentioned this while chatting with a colleague about the dual uses for Elevation Certificates. She pointed out the EC instructions for Item C2.e tell the surveyor to enter the elevation of specific "machinery and equipment items: elevators and their associated equipment, furnaces, hot water heaters, heat pumps, and air conditioners." The instructions go on to say local officials may require elevation for other equipment, given the requirement to ensure "all machinery and equipment servicing the building are protected from flooding." But notice what's missing from the list to determine which equipment is the lowest for the purposes of completing Item C2.e? Utility meters.

So, perhaps the answer in terms of the "gigged" EC is to remove the surveyed elevation of the gas meter and re-shoot the lowest of the specifically listed machinery and equipment. I certainly don't mean to downplay the value of protecting utility meters from flood damage. But communities should not be penalized for something that is beyond their regulatory scope. ≡≡≡

(Taken from The Insider Newsletter, January 2021 Edition)





Order Erased by Trump Could Help Biden Address Rising Seas

President-elect Joe Biden could move immediately to strengthen the nation's resilience to climate change by reinstating an Obama-era policy that would require new federally funded buildings, infrastructure and homes to be flood-proofed, experts say.

As reported in [ClimateWire](#), advocates are urging Biden to quickly revive the Federal Flood Risk Management Standard that President Obama adopted by executive order in early 2015. The policy never took effect because President Trump rescinded it in 2017 before any federal agency could adopt rules implementing the standard.

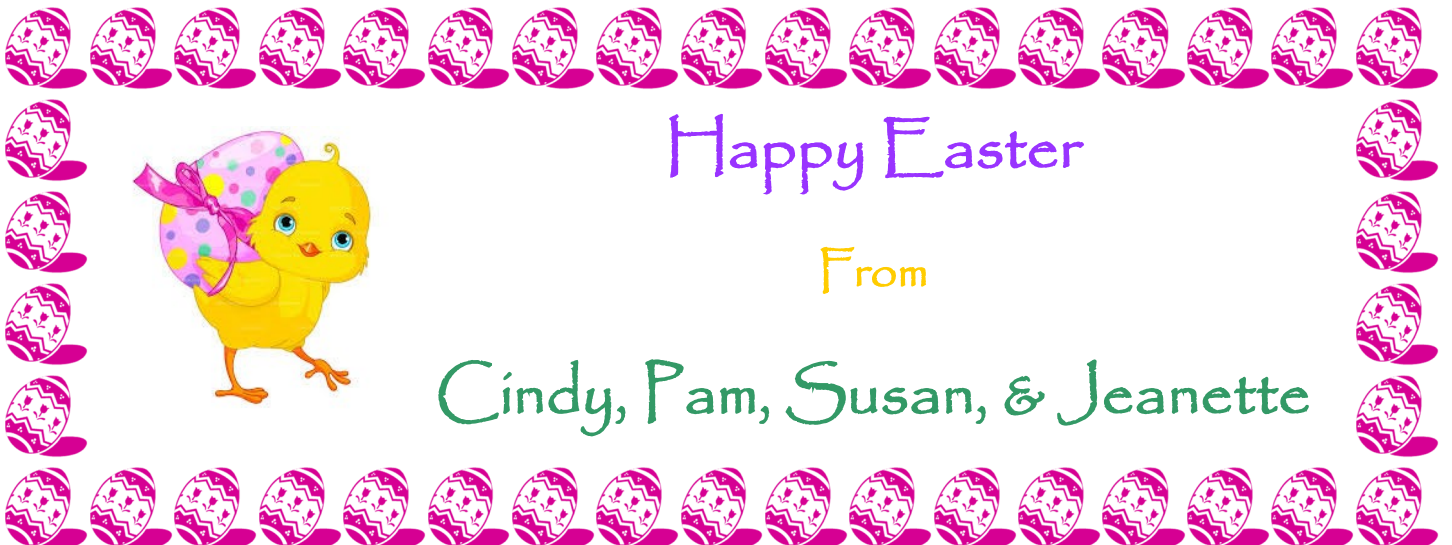
"This is a low-hanging fruit for the incoming Biden administration to reinstate that order," said Chad Berginnis, executive director of the Association of State Floodplain Managers, which has urged Biden to adopt the standard. "I would think this could be a day one type of thing."

The standard sought to impose flood protection requirements on all federally financed projects being built in flood-prone areas to protect them from rising seas and intensifying riverine flooding.

The standard would have applied to a wide range of construction, including new military facilities, EPA-funded projects, public buildings that are paid for with federal disaster aid and new homes backed by the Federal Housing Administration. The buildings and facilities would have needed to be elevated by 2 to 3 feet or have equivalent flood protection.

Biden has indicated support for the policy. Recommendations released by a "unity" task force created last summer between Biden and Sen. Bernie Sanders (I-VT) say a Democratic administration should "reinstate federal flood protection standards." ≡≡≡

(Taken from The Insider Newsletter, January 2021 Edition)





SAVE THE DATES

2021 LFMA ANNUAL TECHNICAL & BUSINESS CONFERENCE AND ANNUAL MEMBERSHIP MEETING



Although not an easy decision, the LFMA Board has made the dreaded decision to again **cancel the annual (in-person) conference**. We have hoped and waited to see if the COVID-19 pandemic situation would improve, but unfortunately, we believe not enough will change in order to allow us to meet safely in-person in April. The health and safety of our members and attendees is our number one priority. We do understand the importance of continuing education and plan to hold **four (4) Virtual Workshops** this year, 4/30/21, 6/25/21, 9/24/21, & 12/10/21. We will also hold our Annual Membership Meeting virtually and hold our elections electronically. **More information will be available under "Upcoming Events"**.

If you would like to submit an abstract for a spot at one of the workshops, please contact:

Michelle Gonzales at mgonzales@jeffparish.net - Continuing Education Chair

Darla Duet at DuetDA@lafourcegov.org - Workshop Chair

For information about your membership, contact the Membership Chair, email: Mbecker@rapc.info

2021 ASFPM Conference is Going Virtual

ASFPM has decided to move the **2021 ASFPM Annual National Conference to an entirely virtual event**. Along with all of you, we had hoped the situation with the COVID-19 pandemic would improve and we might see some signs of a return to normalcy. Unfortunately, at this point, we believe not enough will change in order to allow us to meet safely in-person the first week of May.

Although this was not an easy decision, we are confident that this is the right way forward. The health and safety of our members and attendees is our number one priority — and the best way to ensure that safety is to hold the conference in a virtual space.

We are pleased to share that the hotels and convention center in Raleigh, North Carolina have been incredible to work with and have agreed to re-contract and move everything to 2023. We are equally pleased the North Carolina Association of Floodplain Managers has agreed to host in 2023 when we expect we will be able to meet in person.

We had great success with our virtual conference in 2020, and with this extra lead time, we are planning an even better experience for our 2021 event. The full virtual program will be posted soon, and registration will open later this month. Stay tuned for more updates, and begin making plans to join us online May 9-13! Visit the conference website.

(Taken from the News & Views, February 2021 Newsletter)



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:

LA DOTD
Floodplain Management Section
1201 Capitol Access Road
Baton Rouge, LA 70802

PHONE: 225-379-3005
FAX: 225-379-3002
E-MAIL: pam.lightfoot@la.gov
WEBSITE: <http://floods.dotd.la.gov>

