



# FACTSHEET

Eric Kalivoda  
SECRETARY

December 2023

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

Volume 23 Number 4

**Staff Contacts:**

Edward Knight P.E.  
Chief, Public Works & Water  
Resources Division

Susan Veillon, CFM  
Manager and Editor-in-Chief

Pam Lightfoot, CFM  
Tatanisha White, Editor  
Angela Gil  
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.



## ASFPM Submits Comments in Support of FFRMS Updates

ASFPM has responded to FEMA’s [notice of proposed rulemaking](#) on “Updates to Floodplain Management and Protection of Wetlands Regulations to Implement the Federal Flood Risk Management Standard.”



In our detailed letter submitted Dec. 3, ASFPM stated its strong support for the proposed rule as a way to help ensure federal taxpayer investments will be protected against the risk of flooding — today and in the future. This is especially important given the unprecedented funding made available for federal projects through the Infrastructure Investment and Jobs Act and the Inflation Reduction Act.

In addition, ASFPM voiced agreement that a Climate Informed Science Approach (CISA) is the appropriate primary approach for agencies to use given the advancements in modeling, mapping, and the nearly complete collection of detailed topographic data for the nation. The letter also encouraged the protection of the natural functions or wetlands and floodplain areas, prohibition of the use of fill to achieve design elevations, employment of a wide variety of tools to achieve resilience, strengthening of equity and environmental justice efforts, and the incorporation of community perspective, standards, and data.

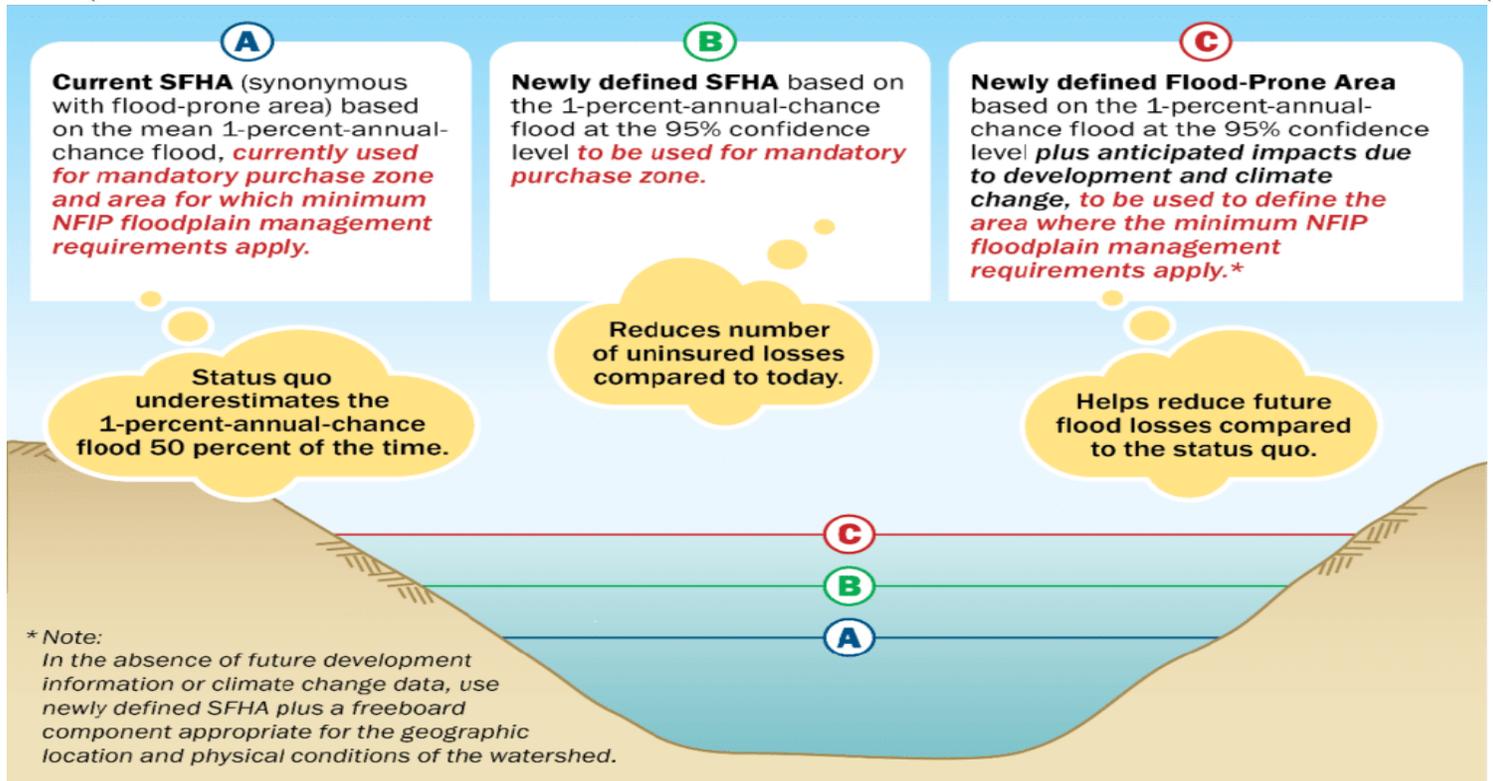
**[Read the ASFPM comment letter.](#)**

ASFPM also joined other organizations in sign-on letters from the [Natural Infrastructure Working Group](#) and the [Flood Policy Alliance](#).

The proposed rule received a total of 48 comment letters. [View them all on Regulations.gov](#)

Inside this issue:	
ASFPM Submits Comments in Support of FFRMS Updates	1
TMAC Recommends Big Changes for How Special Flood Hazard Area is Defined	2-3
NFIP Technical Bulletin 10 is Now Available	4
Prior NFIP Claims History Rating Factor in Risk Rating 2.0	4-5
Dramatic Plan to Expand Flood Areas Could Force Millions to Buy Insurance	5-7
NFIP/CRS Corner	8-9
FEMA Webinars: EC, Floodproofing, & Floodway	10
Mark Your Calendar	11

# TMAC Recommends Big Changes for How Special Flood Hazard Area is Defined



TMAC is recommending that FEMA develop two flood hazard areas: one for determining mandatory purchase requirements and one for floodplain management.

Earlier this year, the Technical Mapping Advisory Council (TMAC) was tasked with the challenge of developing recommendations that would reduce the number of uninsured losses and improve transparency around the potential impacts climate change and proposed development may have on flood risks to people, property, and the environment.

The request from FEMA centered on whether the definition of the Special Flood Hazard Area (SFHA) should be changed and how fill within those areas could be better managed. TMAC members unanimously agreed that change was needed and, over the course of the past few months, developed six recommendations for reducing future flood losses.

Four of the six recommendations relate to the definition of the SFHA while two have to do with fill placement. TMAC hopes the SFHA recommendations increase confidence in the delineated floodplain boundaries, better communicate the uncertainties in developing the floodplain boundaries, and equip floodplain managers with tools to better manage flood risks.

## The Six Recommendations

Listed below are the six recommendations, which are both significant and substantial, and could greatly expand the number of homes required to buy flood insurance. In the report you will also find a narrative discussion following each recommendation to further explain the rationale behind the recommendation.

1. FEMA should develop two flood hazard areas: 1. Special Flood Hazard Area (SFHA) – to be used for determining mandatory purchase requirements based on existing conditions; and 2. Flood-Prone Area (FPA) – to be used for floodplain management requirements based on future conditions.
2. FEMA should develop Special Flood Hazard Areas based on the existing 1-percent-annual-chance flood

(continued on next page)



## TMAC Recommends Big Changes for How Special Flood Hazard Area is Defined (cont...)



by including estimates of uncertainty at the 95% confidence limit, not the mean, as is currently done.

3. FEMA should require the flood hazard area developed for FloodProne Areas (FPAs), for the application of floodplain management requirements, be based on future conditions (including land use and climate change) at the 95% confidence limit.
4. FEMA should develop the 0.2% chance flood based on the same parameters as the 1% including existing and future conditions.
5. FEMA should include all requirements related to the placement of fill in flood-prone areas as part of the floodplain management requirements in 44 CFR 60.3.
6. FEMA should require participating communities as part of permitting duties, to quantify and put on file the impacts of proposed fill and other development on flood stages and the environment prior to issuance of the fill permit. When increases in flood elevation or potential negative environmental consequences are found and cannot be mitigated, at a minimum property owners and appropriate environmental agencies must be notified prior to permit issuance.

“The tasking order and the recommendations address some significant issues that floodplain managers have been aware of for a number of years,” said Chad Berginnis, ASFPM Executive Director. “The recommendations are consistent with several of ASFPM’s policy positions regarding flood hazard identification and fill and it is great to see TMAC take action on them.”

The [Technical Mapping Advisory Council \(TMAC\)](#) is a federal advisory committee established to review and make recommendations to FEMA on matters related to the national flood mapping program. ASFPM members on the committee include Brooke Seymour and Maria Cox-Lamm, who also serve as co-Chairs of ASFPM’s Mapping and Engineering Standards Committee, and Jeff Sparrow, who is the representative for floodplain management organizations.

The final report is expected in Spring 2024. [Download the interim report](#)

*(Taken from the ASFPM FEMA News)*





## FEMA NEWS

### NFIP Technical Bulletin 10 is Now Available

FEMA has released the [National Flood Insurance Program \(NFIP\) Technical Bulletin 10, Reasonably Safe from Flooding Requirement for Building on Filled Land Removed From the Special Flood Hazard Area in Accordance with the National Flood Insurance Program](#) (TB 10). This publication is the latest update to the NFIP Technical Bulletin series.

TB 10 provides guidance on the NFIP requirements related to determining that buildings constructed on filled land will be reasonably safe from flooding. Guidance is provided for the placement of fill and the parameters for the design and construction of buildings on filled land that has been removed from the Special Flood Hazard Area through the flood map revision process managed by FEMA.

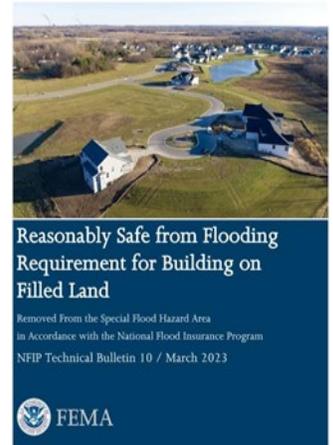
The major updates in TB 10 include:

- The title has been updated. It was previously *Ensuring That Structures Built on Fill In or Near Special Flood Hazard Areas Are Reasonably Safe from Flooding in Accordance with the National Flood Insurance Program*.
- The intent of TB 10, and when it is appropriate to use TB 10, has been clarified.
- Increased emphasis on documentation needed for a local official to make the “reasonably safe from flooding” determination.
- Additional best practices are provided.
- Grouped and reorganization of the content discussing the Technical Approaches to Seepage Analysis in Section 9.

[Download TB10.](#)

To learn more about the 11 NFIP Technical Bulletins, visit the [FEMA National Flood Insurance Technical Bulletins](#)

*(Taken from the ASFPM FEMA News)*



## Prior NFIP Claims History Rating Factor in Risk Rating 2.0

Like in other lines of insurance (e.g., auto, homeowners), NFIP flood insurance rates are affected by past claims. In the case of FEMA’s new rating methodology (known as Risk Rating 2.0), FEMA changed how that rating factor is applied starting April 1, 2023. Basically, the factor will now be based on *future* claims that occur within a 10-year rolling window *after* April 1, 2023. And, it is applied when there are *two or more* claims within that 10-year rolling window.

*(continued on next page)*



## Prior NFIP Claims History Rating Factor in Risk Rating 2.0 (cont...)



Premiums for all buildings identified as **Severe Repetitive Loss (SRL)** properties currently include a 15% SRL Surcharge. However, if going forward additional losses cause the SRL building to meet the above criteria *and* that factor results in a higher premium than the 15% surcharge, then the factor will apply instead of the 15% surcharge.

This updated information will be reflected in the October 2023 Flood Insurance Manual. Meanwhile, more information can be found in FEMA's [March 2023 Bulletin](#).

**Note that the NFIP Claims History can be reset by taking certain mitigation actions. Read the [Resetting Prior Claims History](#) fact sheet for more details.**

*(Taken from the ASFPM FEMA News)*



## Dramatic Plan to Expand Flood Areas Could Force Millions to Buy Insurance



It's a glaring weak spot in climate protection: Millions of U.S. residents don't have flood insurance and face financial ruin if their home is inundated.

But the nation's insurance gap would shrink under a dramatic proposal that could require millions of property owners to buy flood coverage for the first time, potentially costing them thousands of dollars a year.

The [proposal by a federal advisory panel](#) urges the government to expand the areas considered by regulators to be at high risk of flooding, according to a report by the panel that was provided to E&E News.

*(continued on next page)*



## Dramatic Plan to Expand Flood Areas Could Force Millions to Buy Insurance (cont...)

The consequences would be far-reaching and costly because property owners in those areas are required by law to have flood insurance if their property is secured by a federally backed mortgage.

Flood coverage is sold separately from homeowners insurance, and a small fraction of U.S. households have flood policies.

Expanding the flood insurance requirement to millions of additional properties could upend housing markets across the nation by increasing ownership costs. But it could also financially protect millions of people who currently don't have coverage as they face rising flood risk. Uninsured homeowners can collect only a few thousand dollars in federal disaster aid after a major flood.

"This adjustment would be a significant shock," said Jeremy Porter, head of climate implications research at the First Street Foundation, a New York nonprofit that assesses climate risk.

It's unclear how many additional property owners would be required to have flood insurance under the proposal. Coverage costs about \$1,000 a year, but prices are rising rapidly as climate change and increasing development intensify flood damage.

Currently about 8.5 million properties are located in areas considered by the federal government as having a high risk of flooding — a number that is widely believed by experts to be too low.

The First Street Foundation estimates that 19 million properties should be in at-risk areas.

"Half of all properties across the country with significant flood risk don't know it because they are not currently mapped" into a federal flood risk area, Porter said.

The new proposal aims to address well-documented problems with federal flood maps that have contributed to a national shortfall in the use of flood insurance. The maps have been criticized for excluding large tracts of flood-prone area and for leading people who live outside of a designated at-risk area to believe — incorrectly — that they are safe.

The proposal "has a significant positive impact on ensuring that people are more financially protected," said Chad Berginnis, executive director of the Association of State Floodplain Managers. "Insurance is always a front-line protection."

The expansion is recommended in an interim report by the [Technical Mapping Advisory Council](#), which Congress created in 2012 to strengthen the flood program against challenges such as climate change. Its members include state flood officials and experts from federal agencies such as NOAA and the Federal Emergency Management Agency.

The council recommends policy changes to FEMA, which produces U.S. flood maps and runs the nation's largest flood insurance program. The council is expected to discuss its proposals at a meeting Friday.

In addition to recommending that FEMA expand its at-risk flood areas, the council also suggested enlarging "flood protection areas" where the agency restricts development because of flood danger. Roughly 22,000 counties and municipalities are subject to FEMA restrictions that aim to limit development in flood-prone areas and that impose safety requirements such as building elevation.

*(continued on next page)*



## Dramatic Plan to Expand Flood Areas Could Force Millions to Buy Insurance (cont...)

The proposals are likely to be controversial with the real estate industry and with some lawmakers who want to protect constituents from being required to buy flood insurance.

“I’m concerned about the ability of new housing projects to occur in this [proposal],” Michael Mittelholzer, assistant vice president of environmental policy at the National Association of Home Builders, said in an interview. “That could be a problem for communities that are trying to get more housing online.”

Mittelholzer also raised questions about the potential cost of expanding the flood insurance requirement and whether the expansion “is subject to congressional review.”

Rob Moore, director of the climate and water team at the Natural Resources Defense Council, praised the proposed expansion of flood protection areas.

“This is a really significant recommendation,” Moore said. “Those [FEMA] standards are often the only building code or zoning code that applies for some development.”

Although the mapping council report indicates that FEMA can redefine flood zones on its own, new definitions could draw scrutiny in Congress.

Some lawmakers have criticized FEMA over a recent unrelated change in its insurance rates that is causing some premiums to increase by thousands of dollars. The rate restructuring aims to make insurance premiums reflect flood risk more accurately and will lead to price increases for 80 percent of the 4.7 million property owners with policies under FEMA’s National Flood Insurance Program.

Though hailed by environmentalists, the restructuring has been [condemned by lawmakers from coastal states](#) such as Louisiana and New Jersey, where residents will see insurance premiums rise to as much as \$8,000 a year. Ten state attorneys general — all of them Republican — are [suing FEMA to block its rate restructuring](#).

In a statement Thursday about the mapping council report, FEMA said, “As flooding becomes more frequent and severe, FEMA is continuously working with agency partners to develop a more comprehensive picture of its hazards and risks across the nation.”

Flood damage has soared in recent years as climate change has intensified downpours and development is increasing in flood-prone areas. Major flood damage has occurred since 2022 in states such as Kentucky and Vermont that were considered relatively safe.

The mapping council studied FEMA’s flood zones in response to the agency’s request in April for an analysis of whether the at-risk flood areas should be expanded. As FEMA has sought to increase the number of households with flood insurance, the council has recommended policies to make people more aware of flood risk such as [requiring property sellers to disclose](#) flood history.

The mapping council is expected to give FEMA its final report on flood zones in 2024.

*(Taken from the ClimateWire of E&E News)*



## CRS Credit for Social Media

Many communities are using social media to communicate with residents and property owners about flood risks and how to reduce them. These efforts can be credited by the CRS as general outreach projects under Activity 330 Outreach Project (OP).

In 2013, FEMA placed new importance on key flood messages being repeated and coming from multiple sources. Table 330-1 in the 2017 CRS Coordinator's Manual presents the six priority topics in outreach credit. The resource document, "Outreach Projects for Credit under the Community Rating System (CRS)," includes a section on social media (page 17) that provides credit ideas and additional information.

It is important to remember that for any OP credit, "cop[ies] of the flyers, presentations, brochures, etc., that have been produced and disseminated" are required as part of the cycle verification process. For social media, this means copies of (or links to) the social media messages that have been posted and dates that the messages were repeated. Social media, without printing or postage costs, can be disseminated at any time, which lends social media to being a project that can be completed before a cycle visit.

At annual recertification, communities certify that outreach projects that received OP credit at cycle were again conducted (disseminated).

Note that credit for social media can be significant when a community's social media messages cover all six priority topics, and messages are repeated no more than five times per year. There is a limit of two social media platforms, which means two outreach projects. Social media platforms can include (but are not limited to) Facebook, YouTube, Twitter, Instagram, podcasts, and so on. As stated in the CRS Manual, credit for a second language is provided.

### **"What if my community doesn't have social media messages posted by the cycle visit?"**

All CRS communities can request a class modification for CRS activities that are completed after a verification cycle visit (see Section 214 of the CRS Manual) if the additional credit results in a class improvement. When an outreach project such as social media has been disseminated (including repeated), then contact your CRS Specialist and request a class modification. A one-class modification does not require a verification visit. Any other new projects, elements, or activities that have been completed can be credited with a modification, provided all CRS class prerequisites continue to be met.

### **Activity 330 has six CRS priority topics for outreach projects (OP):**

1. Know your flood hazard.
2. Insure your property for your flood hazard.
3. Protect people from the hazard.
4. Protect your property from the hazard.
5. Build responsibly.
6. Protect natural floodplain functions.

**Other topics may be credited with an adopted Plan for Public Information.**



# NFIP/CRS Corner (cont...)

## Questions & Answers

### Q & A

**Q: After receiving my construction certificate review back from my Resource Specialist, I see compliance codes and errors on some of my Elevation Certificates. Do the compliance codes count when determining the 90% correction rate?**

**A:** No, only the errors are counted towards the 90% correction rate. Compliance codes are there to indicate possible compliance issues you may have with a particular Elevation Certificate. But if there are no errors with the same Elevation Certificate, then it is considered “correct.”

**Q: When submitting my annual recertification material or construction certificates to my Resource Specialist, should I also copy my CRS Specialist, the state, and/or FEMA?**

**A:** You are only required to submit your annual documentation to your Resource Specialist, but if you'd like to copy anybody else, you certainly can. Be advised, though, that your Resource Specialist will be the main reviewer for your annual submittals, for CRS purposes. The official acknowledgment or requests for additional material or clarifications will come from your Resource Specialist.

**Q: How important is it to provide my initials in the blanks next to each activity on the recertification statement pages?**

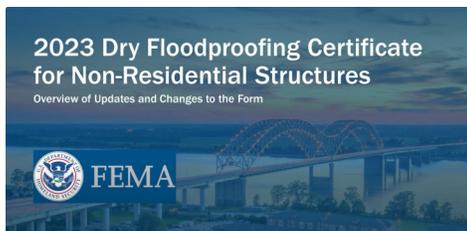
**A:** Very important. The CRS Coordinator's initials are required next to each activity you are doing as the way of self-certifying they are still being implemented. If you leave any blank, it's assumed you are no longer doing them and will slow down ISO's review of your recertification and/or will result in the removal of credit for those activities. This may mean a class (or more) retrograde for your community, so be very intentional when initializing those blanks. Do not use an “x” or a checkmark or anything other than your initials. If any are left blank, please make sure they are for activities you are no longer doing and provide a comment confirming this so it's clear to your reviewer.

*(Taken from the NFIP/CRS Newsletter, February/March 2023)*





## View Recordings on the FEMA Elevation Certificate and Floodproofing Certificate



FEMA has made updates to the functionality of the revised Elevation Certificate and Floodproofing Certificate and posted new versions of the forms. You may access the updated forms at [this site](#). Learn more about what changed by clicking [here](#). If you have questions about the forms or feedback, please email [NFIPUnderwritingMailbox@fema.dhs.gov](mailto:NFIPUnderwritingMailbox@fema.dhs.gov).



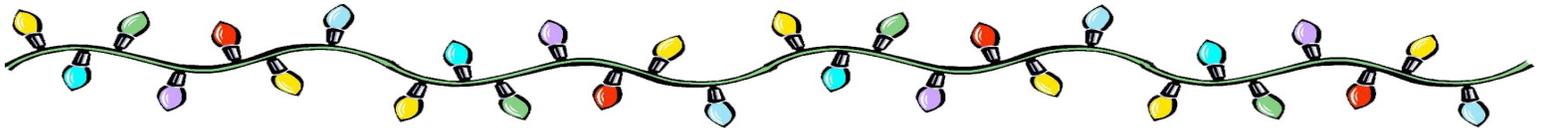
## Development in a Floodway? Learn How to Review a 2-D No-Rise Package





**2024 ASFPM Conference**  
**June 23-27, 2024**  
**Salt Lake City, Utah**

[For more info: View 2024 ASFPM Conference](#)



## **LFMA 2024 Annual Conference**

**April 17-19, 2024**

**Lafayette**  
at the  
**City Club at River Ranch**



Mark your calendars and make plans to join us in a new host City for next year's event. LFMA Annual Conference Call for Presenters—Due Thursday, January 18, 2024.

Speakers will be expected to [register](#) for the conference and make their presentation in person. If you have ideas for sessions please reach out to Michelle Gonzales at [mgonzales@jeffparish.net](mailto:mgonzales@jeffparish.net)



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: [Tatanisha.white@la.gov](mailto:Tatanisha.white@la.gov)  
WEBSITE: <http://floods.dotd.la.gov>

[Click here to subscribe to our email blasts and quarterly newsletter](#)



*Merry Christmas*  
*and*  
*Happy New Year*

From: Susan, Pam, Tatanisha, & Angela