



MAFSM

Maryland Association of Floodplain and Stormwater Managers

The Honorable Benjamin Cardin
509 Hart Senate Office Building
Washington D.C., 20510

ATTN: Staff Handling FEMA Issues

Dear Senator:

The Maryland Association of Floodplain and Stormwater Managers is greatly concerned about the bill to reauthorize the Pre-Disaster Mitigation grant program (S. 3175) which is likely to be brought before you on the Senate floor shortly. While we strongly support the Pre-Disaster Mitigation program (PDM), an amendment adopted in committee would undermine the purpose of the program and inappropriately involve the Federal Emergency Management Agency in work that is the responsibility of the U.S. Army Corps of Engineers (USACE) and the Natural Resource Conservation Service (NRCS).

MAFSM supports programs designed to mitigate flood losses. We work as partners with ASFPM and other agencies toward that objective. We believe that both structural flood control measures (such as levees and dams) and non-structural measures (such as land use and planning, building codes, elevation of buildings, buy-outs, floodproofing of individual buildings) are tools that can be used in reducing flood related damage.

Congress has appropriately funded structural flood control measures through programs of USACE and NRCS. Congress has then asked FEMA to provide support for the community based non-structural measures noted above. Since its inception, community demand for Pre-Disaster Mitigation grants to assist with cost-effective non-structural projects has far outstripped the funds available.

An amendment adopted last week by the Senate Homeland Security and Governmental Affairs Committee during mark-up of S. 3175 makes structural flood control projects eligible for funding through FEMA's PDM program which are currently ineligible. The amendment defines such projects as including:

1. A project relating to the construction, demolition, repair or improvement of a dam, dike, levee, floodwall, seawall, groin, jetty or breakwater;
2. A waterway channelization, or
3. An erosion project relating to beach nourishment or renourishment..."

This amendment to the PDM program opens FEMA's responsibilities to areas that have not been and should not be its task. We urge that Congress not establish duplicate responsibilities and programs in different agencies. In this case, the USACE and NRCS have the staff and procedures to address structural projects, while FEMA has none of that capability, and would thus have to spend tax monies to develop capabilities that already exist in the USACE and NRCS.

Structural flood control costs for single projects often exceed the entire PDM annual national appropriation (in FY 08 the appropriation averaged less than \$2 million/state), so **adding structural measures as eligible projects under PDM will immediately overwhelm this program.** The PDM program could actually assist many communities with non-structural projects so they are not devastated in the next flood---provided the program is not diverted to other communities for projects that should and could be funded by USACE and NRCS.

This 2008 Midwest flood would have been much worse were it not for the 12,000 plus buyouts and elevation of buildings in high risk flood hazard areas that FEMA accomplished after the 1993 Great Midwest floods using FEMA's non-structural mitigation programs. There are many stories circulating in the media about some of the successful non-structural projects that occurred such as the buyout and relocation of the entire communities of Valmeyer and Grafton, Illinois. Neither is experiencing a fraction of the problems and damage this time around.

In summation, we wish to strongly emphasize that the communities of our nation are following the dictates of the Disaster Mitigation Act of 2000, which required the development and adoption of local hazard mitigation plans to qualify for grants. Their efforts are now coming to successful completion. The number of communities now eligible for PDM funds will increase by several hundreds, if not by thousands. This amendment will redirect the available PDM funds inappropriately; just as communities have finished the requirements to begin application for projects their citizens have helped plan and support.

MAFSM represents over 100 state and local officials and other professionals who are engaged in all aspects of floodplain management and hazard mitigation in Maryland. This includes floodplain management, mapping, engineering, planning, community development, hydrology, forecasting, emergency response, water resources management and insurance. For more information on MAFSM, our website is: www.MAFSM.org.

If you have additional questions, please do not hesitate to contact me at necollemaccherone@mapmodteam.com or Mary Roman, Chair at Mary_Roman@URSCorp.com.

Sincerely,

Necolle Maccherone, CFM
MAFSM Secretary