Mitigation Plan Update:
An Opportunity to Mitigate Repetitive Loss Properties Using FEMA’s National Tool (NT)
Disaster Mitigation Act of 2000
- Signed into law on October 30, 2000
- Amended the Stafford Act (section 322)

Requires local governments to develop natural hazard mitigation plan and update every 5 years for mitigation funding eligibility

Plan establishes eligibility for Hazard Mitigation Assistance (HMA) grant funding
- HMGP, PDM, FMA, RFC, SRL
Hazard Mitigation Plan Update

- A requirement (44CFR 201.6)
- Also an opportunity
  - Better risk assessment (uses HAZUS, addresses climate change)
  - Better planning process (involves special needs, uses social media for outreach)
  - Develop fundable mitigation actions
Plan Expiration

Plans expiring earliest can begin preparing for updates.
Mitigation Planning Guidance

- Revised version is dated July 1, 2008
- Plan Review Crosswalk is used to check compliance and approve plans

Local Multi-Hazard Mitigation Planning Guidance
July 1, 2008

FEMA

Mitigation Plan Update: An Opportunity to Mitigate Repetitive Loss Properties Using FEMA’s National Tool (NT)
New Requirements

- As of October 1, 2007, the planning requirements of the Flood Mitigation Assistance (FMA) grant program and the Hazard Mitigation Plan are identical

- Only one mitigation plan is required

Therefore:

- NFIP communities must address repetitively damaged (flooded) structures

- NFIP communities must include a strategy for continued compliance with NFIP requirements
Repetitive Loss Properties

- A Repetitive Loss (RL) property is any insurable building for which the National Flood Insurance Program (NFIP) paid, since 1978
  - Two or more claims of more than $1,000 each
  - Within any rolling 10-year period
- Over 112,540 RL properties nationwide
  (Source: Congressional Research Services Report, 2005)
Currently, there are **711** RL properties in Maryland.
Severe Repetitive Losses in MD

An SRL property is defined as a residential property covered under an NFIP flood insurance policy and:

(a) That has at least four NFIP claim payments (including building and contents) over $5,000 each, and the cumulative amount of such claims payments exceeds $20,000; or

(b) For which at least two separate claims payments (building payments only) have been made with the cumulative amount of the building portion of such claims exceeding the market value of the building.

For both (a) and (b) above, at least two of the referenced claims must have occurred within any ten-year period, and must be greater than 10 days apart.
New Requirements

LOCAL MITIGATION PLAN REVIEW CROSSWALK

LOCAL MITIGATION PLAN REVIEW SUMMARY

The plan cannot be approved if the plan has not been formally adopted. Each requirement includes separate elements. All elements of the requirement must be rated “Satisfactory” in order for the requirement to be fulfilled and receive a score of “Satisfactory.” Elements of each requirement are listed on the following pages of the Plan Review Crosswalk. A “Needs Improvement” score on elements shaded in gray (recommended but not required) will not preclude the plan from passing. Reviewer’s comments must be provided for requirements receiving a “Needs Improvement” score.

SCORING SYSTEM

Please check one of the following for each requirement.

N – Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer’s comments must be provided.

S – Satisfactory: The plan meets the minimum for the requirement. Reviewer’s comments are encouraged, but not required.

Mitigation Strategy

13. Local Hazard Mitigation Goals: §201.6(c)(3)(i)
14. Identification and Analysis of Mitigation Actions: §201.6(c)(3)(ii)
15. Identification and Analysis of Mitigation Actions: NFIP Compliance: §201.6(c)(3)(ii)
16. Incorporation of Mitigation Actions: §201.6(c)(3)(iii)
17. Multi-Jurisdictional Mitigation Actions: §201.6(c)(3)(iv)

Plan Maintenance Process

18. Monitoring, Evaluating, and Updating the Plan: §201.6(c)(4)(i)
19. Incorporation Into Existing Planning Mechanisms: §201.6(c)(4)(ii)
20. Continued Public Involvement: §201.6(c)(4)(iii)

Additional State Requirements*

Insert State Requirement
Insert State Requirement
Insert State Requirement

LOCAL MITIGATION PLAN APPROVAL STATUS

PLAN NOT APPROVED

See Reviewer’s Comments

PLAN APPROVED

*States that have additional requirements can add them in the appropriate sections of the Local Multi-Hazard Mitigation Planning Guidance or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.
A. Does the new or updated plan describe vulnerability in terms of the types and numbers of repetitive loss properties located in the identified hazard areas?

Note: This requirement becomes effective for all local plans approved after October 1, 2008.
## LOCAL MITIGATION PLAN REVIEW CROSSWALK

### 15. Identification and Analysis of Mitigation Actions: National Flood Insurance Program (NFIP) Compliance

**Requirement:** §201.6(c)(3)(ii): [The mitigation strategy] must also address the jurisdiction’s participation in the National Flood Insurance Program (NFIP), and continued compliance with NFIP requirements, as appropriate.

<table>
<thead>
<tr>
<th>Element</th>
<th>Reviewer’s Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Does the new or updated plan describe the jurisdiction(s) participation in the NFIP?</td>
<td>Note: This requirement becomes effective for all local mitigation plans approved after October 1, 2008.</td>
</tr>
<tr>
<td>B. Does the mitigation strategy identify, analyze and prioritize actions related to continued compliance with the NFIP?</td>
<td>Note: This requirement becomes effective for all local mitigation plans approved after October 1, 2008.</td>
</tr>
</tbody>
</table>

**SUMMARY SCORE**

### 16. Implementation of Mitigation Actions

**Requirement:** §201.6(c)(3)(ii): [The mitigation strategy or plan shall include] an action plan describing how the actions identified in section (c)(3)(ii) will be prioritized, implemented, and administered by the local jurisdiction. Prioritization shall include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.

<table>
<thead>
<tr>
<th>Element</th>
<th>Reviewer’s Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Does the new or updated mitigation strategy include how the actions are prioritized? (For example, is there a discussion of the process and criteria used?)</td>
<td></td>
</tr>
<tr>
<td>B. Does the new or updated mitigation strategy address how the actions will be implemented, including the responsible parties, potential resources and the expected time for each action?</td>
<td></td>
</tr>
<tr>
<td>C. Does the new or updated mitigation strategy address an emphasis on the use of non-invasive methods to maximize benefits?</td>
<td></td>
</tr>
<tr>
<td>D. Does the new or updated mitigation strategy address an emphasis on the use of deferred mitigation actions, and if any activities have been deferred, does the updated plan take into account changes in priorities?</td>
<td></td>
</tr>
</tbody>
</table>

**SUMMARY SCORE**
Mitigation Plan Update: An Opportunity to Mitigate Repetitive Loss Properties Using FEMA's National Tool (NT)

NFIP communities must include a strategy for continued compliance with NFIP requirements

☐ Join the NFIP.

☐ Participate in NFIP training offered by the State and/or FEMA (or in other training) that addresses flood hazard planning and management.

☐ Establish mutual aid agreements with neighboring communities to address administering the NFIP following a major storm event.

☐ Address NFIP monitoring and compliance activities.

☐ Revise/adopt subdivision regulations, erosion control regulations, board of health regulations, etc. to improve floodplain management in the community.

☐ Participate in Community Rating System (CRS) or undertake activities to increase the grade level of the community’s CRS current participation.

☐ Prepare, distribute or make available NFIP, insurance and building codes explanatory pamphlets or booklets.

☐ Identify and become knowledgeable of non-compliant structures in the community.

☐ Identify and become knowledgeable of submit to rate structures.

☐ Identify cause of submit to rate structure and analyze how to prevent non-compliant structures in the future.

☐ Inspect foundations at time of completion before framing to determine if lowest floor is at or above Base Flood Elevation (BFE).

☐ Require use of elevation certificates.

☐ Enhance local officials, builders, developers, local citizens and other stakeholders’ knowledge of how to read and interpret the FIRM.

☐ Work with elected officials, the state and FEMA to correct existing compliance issues and prevent any future NFIP compliance issues through continuous communications, training and education.
Additionally, a community may adopt more restrictive standards...

- to provide additional protection to lives and properties
- may qualify for participation in the Community Rating System (CRS)

Refer to publication *CRS Credit for Higher Regulatory Standards*, available on www.FEMA.gov

- Freeboard
  - Defined as a factor of safety usually expressed in feet above a flood level i.e.: require elevations to be 2 feet above base flood elevation (BFE)
- Protection of critical facilities
  - Meet 500-year floodplain standards
- Protection of floodplain storage capacity
  - Prohibit fill in the 100-year floodplain
- Enclosure limits
  - Prohibit all enclosures or limit the enclosure area
- Mandatory disclosure laws
  - Require notification that property is located in 100-year floodplain
- More strict enforcement of building codes as it relates to the floodplain
  - As it relates to planning and zoning
- Adoption of international building codes
  - More restrictive floodplain management standards
- Zoning requirements
  - More restrictive floodplain management standards
- Higher floodway standards
  - Designate 100-year floodplain as floodway
- Elevation certificate requirement for all new development
  - Development in Zones B, C, and X
Hazard Mitigation Plan Update

While updating the hazard mitigation plan:

- Indicate the number of repetitive loss properties
  - If there are none, state this (do not just leave it out)
  - Indicate whether any of the repetitive loss properties have been removed (e.g., through an acquisition program)

- Include actions to address repetitive loss properties (e.g., acquisition, elevation)
  - Use the National Tool to identify the most appropriate mitigation action

- Include actions for continued compliance with the NFIP
  - Adopt higher regulatory standards for extra benefit

- Do not violate privacy of homeowners by publishing names, addresses, or insurance payment information in the plan
Process to Address RL Properties

1. RL Data from NFIP Coordinator or SHMO
2. Input RL Data into National Tool
3. Review Data
4. Find Addresses
5. Select Properties... Insured?
6. Evaluate Results, Complete Worksheet B Using FEMA 551
7. Run 551 Report (Worksheet A)
8. Gather Additional Data
9. Visit Site
10. Add Actions to Hazard Mitigation Plan
11. Submit Updates (AW 501s) to SHMO, NFIP Coordinator
National Flood Mitigation Data Collection Tool

(NT or National Tool)
National Flood Mitigation Data Collection Tool

(NT or National Tool)

- Standardized method for gathering information on floodprone structures to determine appropriate, fundable mitigation measures

- Specific to floodprone properties, but can be used to gather information on flood risk, building construction, and building value for any structure

- Available for free download from FEMA’s library
Where to find the NT?

http://www.fema.gov/plan/prevent/floodplain/data_tool.shtm

National Flood Mitigation Data Collection Tool and RLP Viewer

The National Flood Mitigation Data Collection Tool (National Tool or NT) Version 3.04 was developed for nationwide use to gather information about flood-prone structures in order to evaluate appropriate long-term mitigation measures. Data fields within the NT require information from a variety of sources, including: NFIP policy information; community building, tax, and historical flood records; and field reconnaissance. Having detailed data helps to create a clearer picture of the property and its flood risk. Download the National Flood Mitigation Data Collection Tool.

The Repetitive Loss Property (RLP) Viewer 2.0 is a standalone application capable of connecting to any standard NT database in Access format (.MDB) that uses GIS to display point features representing flood-prone properties over base map data such as roads, streams, county and community boundaries, and Q3 flood maps. New property point shape files can be produced by reading latitude and longitude coordinates stored inside the NT Access file for each location. Download the RLP Viewer software.

The NT User Guide (FEMA 497) has been developed to provide instructions and installation/software requirements for using the NT and installing the RLP Viewer. Please also see FEMA 497: Appendix A for system requirements and installation requirements.
Receive NFIP RL Data & Import into NT
Review the RL Property
Decide Which Properties to Visit

Visit:
- Validated, Validated Uninsured, and Pending SRLs
- RLs with over $50k in Total Building Payments

Will not visit:
- Uninsured RL properties
- Total Number RLs to Visit = 12
Conduct Site Visit

**Before you go:**
- Enter FIRM Data into NT
- Enter Assessor Data into NT
- Print driving directions or program GPS from property to property
- If not taking laptop into field, print Field Forms from NT

**Take with you:**
- Map of area (even if using a GPS/Electronic Navigator)
- GPS Handheld unit to record Latitude & Longitude
- Digital camera, extra battery, and extra memory card
- Laptop with NT or hardcopy NT Field Forms
Site Visit Results
Site Visit Results
Site Visit Results
Mitigation Plan Update: An Opportunity to Mitigate Repetitive Loss Properties Using FEMA’s National Tool (NT)

<table>
<thead>
<tr>
<th>Repetitive Loss Number:</th>
<th>0</th>
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</table>

<table>
<thead>
<tr>
<th>Repetitive Loss Name:</th>
<th>WHITE DEER, TOWNSHIP OF</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Local Property Identifier:</th>
<th>CID#: 421034</th>
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</thead>
</table>

<table>
<thead>
<tr>
<th>Current Property Address:</th>
<th>RTS 629 &amp; OLD RT 15, ON RT 520 110 M S OF PA</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Previous Property Address/Community ID #:</th>
<th>RTS 629 &amp; OLD RR 15, ON RR 520 PA</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Claimant:</th>
<th>YES</th>
</tr>
</thead>
</table>

|-------------------|----------------------|

<table>
<thead>
<tr>
<th>Requested Updates:</th>
<th>TOTAL NUMBER OF LOSSES FOR PROPERTY: 2</th>
</tr>
</thead>
</table>

1. **Information Provided Not Sufficient to Identify Property**
   - Choose this update if all attempts to locate the property fail. Please describe the steps you took to locate the property in the comments section below.

2. **Cosmetic Changes Required to the Address:**
   - Update the address shown above and/or add your local alternative property identifier such as a Tax Assessor #.

3. **Property Not in Our Community or Jurisdiction:**
   - Choose this update if you have positively determined that the property shown is not located in your community. Please provide the correct NFIP community name and if known the NFIP Community ID #. If available, please attach a map showing the property location.

4. **Flood Protection Provided:**
   - Choose this update only if some type of structural intervention has occurred to the building, property or the source of flooding that protects the building from future events similar to those that occurred in the past. The correction must be supported by documentation such as an Elevation Certificate and the Mitigation action and funding information below must be provided.

5. **No Building on Property:**
   - Choose this update only if the property in question can be positively identified as the site of the previously flooded building and documentation is available to support that an insurable building no longer exists at this site. The correction must be supported by documentation such as a Demolition or Relocation Permit and the Mitigation Information below must be provided.

6. **Duplicate Listing with RL Number:**
   - Choose this update to identify two or more separate listings that are for the same building. List all other RL numbers that are duplicates to the property. Please indicate which address shown is the correct address to use.

7. **Historic Building:**
   - Check this box if this property is considered a historic building.

---

**URS**

Mitigation Plan Update: An Opportunity to Mitigate Repetitive Loss Properties Using FEMA’s National Tool (NT)
NFIP Mitigated Properties Updates

FEMA Form AW-501

In order to maintain accurate, up-to-date records of all repetitive loss properties mitigated as a result of FEMA mitigation grants, FEMA requires the submission of Form AW-501, NFIP Repetitive Loss Update Worksheet (OMB #1660-0022). Typically, this form is completed by the State or community, but may be completed by a Region with appropriate documentation that shows any changes in the status of a property (e.g., elevation certificate). This form, along with the transmittal sheet or other document signed by an authorized community official, must be submitted for each property mitigated with FEMA funds prior to closeout. Form AW-501 and instructions for completing and submitting the Form are available via the links below:

- Form AW-501 Form
- Form AW-501 Instructions
- Form AW-501 Transmittal Sheet
FEMA 551

Selecting Appropriate Mitigation Measures for Floodprone Structures
### Worksheet A: Technical Considerations Scorecard

<table>
<thead>
<tr>
<th>Question</th>
<th>Response</th>
<th>Drainage Improvements</th>
<th>Barriers</th>
<th>Wet Flood-proofing</th>
<th>Dry Flood-proofing</th>
<th>Elevation</th>
<th>Relocation</th>
<th>Acquisition</th>
<th>Comments</th>
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<tbody>
<tr>
<td>1. What is the structure type?</td>
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<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>NT Reference - Limited Data View, Site Observations tab</td>
<td>Wood Frame / Metal / Other</td>
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<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
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<td></td>
</tr>
<tr>
<td></td>
<td>Concrete / Masonry / Brick Faced</td>
<td>✓</td>
<td>✓</td>
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<td></td>
<td>Manufactured Home</td>
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<td>2. What is the condition of the structure?</td>
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</table>
# Worksheet B: Appropriate Mitigation Measures

<table>
<thead>
<tr>
<th>Mitigation Measures</th>
<th>Technical Considerations*</th>
<th>Relative Costs*</th>
<th>Human Intervention</th>
<th>Annual Maintenance</th>
<th>Total Score</th>
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<td>Elevation</td>
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</table>
Results of FEMA 551 for Union County, PA

Appropriate Mitigation Measures:

- Acquisition – 9 properties
- Relocation – 2 properties
- Elevation – 2 properties
Next Steps

Selecting Appropriate Mitigation Measures for Floodprone Structures: Information Packet

This information packet includes the following documents:
- Technical Considerations Scorecard (Worksheet A)
- Appropriate Mitigation Measures (Worksheet B)
- Initial Consultation with Property Owner (Worksheet C)
- Preliminary Cost Estimating Worksheet (Worksheet D)
- NT Basic Report

Date Prepared: ________________  Date Property Visited: ________________

Property Owner Name: ____________________________

Property Address: ________________________________

Repetitive Loss Property Locator Number: ________________

Prepared by: ___________________________________
Results of Case Study

- Valid addresses for RLs
- Found that some RLs were already mitigated (updated data can be submitted to NFIP coordinator)
- Developed mitigation actions that are technically feasible and cost-effective (using NT and FEMA 551)
- Clear path for Union County, PA to move forward with hazard mitigation
Key Points

Using the National Tool (NT)

- Helps meet the requirements for mitigation plan updates to address RL properties
- Provides a defensible methodology for identifying technically feasible mitigation actions
- Improves the accuracy of the RL database (which helps mitigate RL properties in the future)
Questions?

Link to NT:
http://www.fema.gov/plan/prevent/floodplain/data_tool.shtm

Link to AW-501 Form, Instructions & Transmittal Letter:
http://fema.gov/government/grant/resources/aw501ins.shtm

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