



The Antediluvian

Ohio's Floodplain Management Newsletter

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MISSION STATEMENT: The Mission of Floodplain Management Program is to provide leadership to local governments, state agencies, and interested parties toward cooperative management of Ohio's floodplains to support the reduction of flood damage and the recognition of the floodplain's natural benefit. This mission will be accomplished through technical assistance, public awareness, education, and development/protection standards.

Improving the National Flood Insurance Program

By Cynthia J. Crecelius, Supervisor

Since its creation in 1968, the National Flood Insurance Program (NFIP) has been evolving. The program has been improved and refined by Congress on several occasions to make its implementation and enforcement more consistent with national floodplain management goals. The goal of the program is to reduce the potential for flood damage to life and property and to reduce federal expenditures for uninsured properties at risk due flooding. Its strength is in the variety of strategies and tools that have been developed to assist the local communities with comprehensive floodplain management. Participation in the NFIP provides a framework for implementing strategies to 1) modify susceptibility to damage and disruption from flooding, 2) modify flooding, 3) modify the impacts of flooding, and 4) restore/preserve the natural and cultural resources of the floodplain. The program design supports a partnership for management amongst local, state, federal, private and public interests. The minimum development criteria, in the form of regulations, and the hazard identification maps are tools that allow the local community to effectively implement the noted strategies to accomplish flood damage reduction.

Key weaknesses of the NFIP have been inability to mitigate the damage potential of existing structures in flood hazard areas and no enforcement tools for requiring lenders to satisfy mandatory flood insurance purchase requirements. These weaknesses have been simplified in the wake of several recent disasters including the 1993 Mississippi River basin flooding. To improve the effectiveness of the program federal legislation was-drafted and signed into law September

23, 1994 by President Clinton. *The Riegle Community Development and Regulatory Improvement Act of 1994*, Title V (P.L. 103-325) contains several changes aimed at strengthening the mitigation potential and lender compliance of the NFIP. The legislation is commonly known as *National Flood Insurance Reform Act of 1994*. The following is a summary of the major provisions of the legislation prepared by the Association of State Floodplain Managers amended from the October 1994 *News and Views*.

Mitigation Provisions

The reforms are designed to provide financial assistance that will allow states and communities to mitigate before a flood results in damage to homes and businesses. The funding will support the planning and implementation of activities to reduce flood damage. Much of the reform language focuses on structures that are repeatedly damaged or which suffer major damage in anyone event.

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- Defines *repetitive loss structure* as any insured structure incurring flood damage on at least two occasions in a 10-year period for which the cost of repair, on average, equals or exceeds 25% value of structure
- Authorizes \$20 million per year transfer from the National Flood Insurance Fund to a Mitigation Fund with an initial three year phase-in
- Requires states and communities to develop mitigation plans, including a comprehensive strategy for implementation to be eligible for mitigation grants
- Provides grants (75%-25%) to states and communities for mitigation planning, annual total of \$1.5 million to be allocated with no more than \$150,000 per state, \$50,000 per community and \$300,000 in any state per fiscal year
- Provides grants (75%-25%) to states and communities with approved mitigation plans, to implement technically feasible and cost-effective projects; annual total of \$18.5 million to be allocated with no more than \$10 million per state, \$3.3 million per community and \$20 million in any state per 5-year period
- Allows in-kind contributions of not more than half of the non-federal share
- Allows Federal Emergency Management Agency (FEMA) to waive funding limits in the event of major disaster event
- Defines grant eligible activities as elevation, relocation, demolition or floodproofing of structures, acquisition, technical assistance by states to local communities and individuals, minor physical structures not duplicated by other federal programs (not major levee, seawall or groin structures unless found to be cost effective)
- Repeals Sections 1362 and 1306(c) *Jones/Upton* provisions by which FEMA

purchased certain eligible properties and provides for a one year transition period

Mitigation Insurance

The mitigation insurance will assist policyholders who rebuild damaged structures according to their local floodproofing and mitigation regulations. Additional construction costs are associated with flood-protecting structures and the mitigation insurance will act as a financial incentive. Statistics indicate that repetitively-damaged structures represent less than 3% of the properties insured, but account for approximately 40% of losses paid. The cost for the mitigation insurance will be included with the premium and be based on the risk of the structure's likelihood of being damaged and making a claim.

- Provides coverage to 1) repetitive loss properties, 2) properties that have sustained flood damage in which the cost of repairs equals or exceeds 50% of the value of the structure prior to damage, or 3) properties that have sustained flood damage on multiple occasions FEMA determines it is cost-effective and in the best interest of the NFIP to require compliance with flood damage prevention standards
- FEMA to charge not more than \$75 per policy for providing mitigation insurance coverage

Erosion Hazard Provisions

- Directs FEMA to study (in a two-year period) communities likely to have erosion hazard areas to estimate claims attributable to erosion and the economic impact of erosion on the NFIP
- Directs FEMA to determine the cost and benefits of expenditures from the NFIP to complete erosion mapping; requires a report to evaluate the impact of insurance denial as well as establishment of actuarial rates for erosion hazard areas, determine impact on property values, tax revenues, employment, economic development, and estimates of federal and state disaster assistance

- Authorizes \$5 million to map erosion in a statistically valid and representative number of communities, including coastal, Great Lakes, and riverine areas, and to conduct study

Disaster Assistance Provisions

- Prohibits waiver of requirement to purchase flood insurance as a condition of receiving federal disaster assistance
- Directs that *no federal disaster relief assistance* may be used to make payments, including loan assistance, to any person for repair, replacement, or restoration for damage to any personal, residential, or commercial property if that person had previously received such assistance on condition of obtaining flood insurance under federal law and subsequently failed to obtain and maintain coverage as required

Other Provisions

- Increases maximum coverage for insurance to residential structures to \$250,000; residential contents to \$100,000; nonresidential structures to \$500,000; nonresidential contents to \$500,000
- Establishes a 30-day waiting period after purchase of flood insurance before eligibility, except initial purchase of insurance required by lender
- Creates task force to develop recommendations for reducing flood losses by protection of natural and beneficial floodplain functions
- Authorizes the Community Rating System to provide incentives for measures to reduce the risk of flood or erosion damage that exceed federal minimum criteria in the NFIP, incentives may be provided in communities that protect natural and beneficial floodplain functions, which manage erosion hazards, and that promote reduction of flood insurance losses
- Allows discretion by states and communities to allow repair and restoration to pre-damaged

conditions of agricultural structures that have been repetitively or substantially damaged

- For agricultural structures rebuilt without full compliance, limits availability of flood insurance to wet floodproofed structures and prohibits future disaster assistance
- Creates Flood Insurance Interagency Task Force to study recommendations regarding various aspects of lender compliance
- Restricts FEMA from increasing the rate within any single risk zone by more than 10% per year, not including additional premium for mitigation insurance
- Requires 5-year periodic review of the need to revise and update flood and erosion hazard areas, allows states and communities to request revisions and provide cost-sharing
- Directs FEMA to make maps and data available, free of charge, to federal agencies, NFIP state coordinators and communities and at reasonable cost to others
- Establishes Technical Mapping Advisory Council with members from all government sectors, map determination firms, engineering and surveying firms and other interested parties; council to make recommendations on accuracy, quality, use and distribution of *Flood Insurance Rate Maps*, mapping standards and guidelines, and coordinate with national digital spatial data collection and management standards
- Extends NFIP authorization to September 30, 1996

Lender Compliance Provisions

Increasing the lender compliance will result in an increase in the number of flood insurance policies that are placed and maintained. Information gathered by the NFIP indicates that less than 25% of the structures at risk nationwide are covered by current flood insurance policies. (In Ohio, fewer than 10% of the structures at risk are estimated to be

covered by flood policies.) More comprehensive insurance coverage will protect more people nationwide and will reduce the need for federal disaster assistance.

- Requires lenders that escrow for other purposes to escrow flood insurance premiums beginning one year from enactment
- Requires lenders to notify residential real estate purchasers in Special Flood Hazard Areas of requirement to obtain flood insurance
- Specifies contents of notice to property owners indicating flood hazard location, insurance purchase requirement, and how to obtain insurance
- Provides authority for lenders to request borrowers to purchase flood insurance or to *force place* on behalf of borrowers and to charge for premiums and fees
- Requires FEMA to develop *Standard Hazard Determination* forms for use by lenders in determining flood hazard exposure of properties specific contents, including hazard zone, map panel, and date, and that a determination is valid for 5 years
- Provides use of third-party determinations using required forms provided that accuracy is guaranteed
- Requires determination of lender compliance during scheduled on-site examinations, and provides for reporting to Congress of certain statistics regarding compliance and recommendations for improvement
- Specifies that examination and reporting requirements apply to federally insured credit unions
- Specifies civil penalties of not more than \$350 for each violation of flood insurance requirements, and not more than \$100,000 per lender in any calendar year

- Allows lenders to charge, in certain instances, reasonable fee for determining if property is in the SFHA

The overall purpose of the National Flood Insurance Program reform legislation is to strengthen weaknesses observed in nearly three decades of implementation. The increase of lenders' compliance with requirements, and mitigation financial assistance for states, communities and individuals will lead to reduced flood damage. More people will be buying and maintaining flood insurance coverage. This provides a mechanism, independent from Federal disaster assistance, which will allow people to recover and rebuild structures with less flood risk.

Copies of the *National Flood Insurance Reform Act of 1994* may be obtained from our office at (614) 265-6750. 

FOR ANSWERS TO
FLOOD INSURANCE QUESTIONS
CALL

1 – 800 – 638 - 6620

Tornado / Flood Safety Awareness Week



By Christopher M. Thoms, Planner

In a continuing effort to provide safety education to the citizens of Ohio, Governor Voinovich has designated March 12-18, 1995 as **Tornado/Flood Safety Awareness Week**. With almost 300,000 structures located in flood hazard areas, Ohio is particularly vulnerable to flood damage.

Hundreds of lives and millions of dollars in property have been lost to floods in Ohio and the cost is ever increasing. Join with us to spread the word about floods, floodplains, and what we all can do to be prepared in case of a flood disaster.

For more information, contact: your community emergency management director or our office at (614) 2656750. 

Floodplain Management Videos Available



By Michael K. Gease, Senior Planner

The ODNR, Division of Water, Floodplain Management Program has videocassettes available on floodplain management topics such as historical floods, and floodproofing construction techniques. The videocassettes are available on loan. The following is a list of currently available videocassettes on VHS format:

Association of State floodplain Managers Conference Presentation, 5/92. Keynote presentation on the history of floodplain management.

The Awesome Power, National Oceanic Atmospheric Administration / National Weather Service. Dramatic depiction of flash flood hazards (17 min.).

Best Build Series, vols. 2 & 3, FEMA / National Association of Home Builders. A review of flood resistant construction materials and methods (30 min. each).

Community Floodplain Management Course, FEMA / EENET, 8/89. Basics of establishing local floodplain management programs.

Community Floodplain Management Video-course, FEMA, vols. 1 & 2. Instructional video on establishing effective local floodplain management programs (1 hr. and 1 hr. 42 min.).

Community Rating System, NFJP. Overview of the CRS Program (13 min.).

Flash Floods: A Warning to Beware, Arizona Floodplain Management Association. Flash flooding in America's Southwest.

The Flood of 1991 (Texas), Lower Colorado River Authority. Review of major flooding problems in Central Texas (24 min.).

How to Use NFIP Flood Information, Pennsylvania Department of Community Affairs, 12/92. Instructional video for use by Pennsylvania communities (22 min).

The Rainbow Connection, NFIP, 1992. Impact of 1991 Hurricane Bob along the Atlantic Seaboard.

Regulating Floodplain Development, Pennsylvania Department of Community Affairs, 10/92, Review of Pennsylvania standards for floodplain management (18 min.).

Stairway to Progress, University of Cincinnati. Studies the impact of river locks and dams on flood stages.

For more information on obtaining a video, please contact our office at (614) 265-6750. If you have a video that you would like to share with other floodplain managers, please let us know. We will consider adding it to our expanding video library! 

Would You Like to See an Association of Local Floodplain Managers?

By Cynthia J. Crecelius, Supervisor

Enclosed with this newsletter you will find a survey asking for your opinions concerning the need for an association of local floodplain managers. For several years our peers in neighboring states and regions have created formal

networks for promoting solutions to flooding problems. Are we missing the related benefits of an Information exchange forum, training opportunities, improved partnerships between all levels of government and unified support for legislative needs by not creating an association?

Please take a few moments from your busy schedules to let us know if you think: we can improve our efforts to reduce flood damage and promote the natural benefits of the floodplain through a statewide association. As you will note from the survey, one way for us to accomplish the organization and administration of this entity would be to link with the existing Water Management Association of Ohio (WMAO). As we all move to incorporate multi-objective management into our water resource programs, and improve the partnerships we have with all levels of government, the private sector and the public, the creation of an association of innovative professionals may provide an exciting vehicle. 💧

PLEASE PROVIDE YOUR SURVEY
COMMENTS BY MARCH 20, 1995,
YOUR INPUT COUNTS!

Map Revisions and Amendments



By Chad M. Berginnis, Planner

Map revisions are one of the more complex issues for communities participating in the National Flood Insurance Program (NFIP). Due to different mapping levels, regulatory requirements for particular mapped areas and the seemingly endless variety of floodplain development, the map revision process is, at best, murky to most local floodplain administrators, consultants, lenders, appraisers, and homeowners. However, revising and amending floodplain maps is not an isolated process.

To issue or deny floodplain permits, the floodplain administrator must rely on accurate flood maps, and is responsible for requiring technical analyses

reporting to FEMA which projects affect base flood elevations (BFEs) and floodway boundaries.

A map revision is essentially any change to a FEMA *Flood Hazard Boundary Map*, *Flood Insurance Rate Map*, or *Flood Boundary and Floodway Map*. At the cost of nearly a billion dollars, the federal government has mapped and studied flood hazards nationwide. The results of this massive effort are the FEMA floodplain maps that serve as a technical basis for floodplain regulations to communities' participating in the National Flood Insurance Program. To provide a sound basis for floodplain management and insurance rating, NFIP maps must present current and accurate flood risk data.

Map revisions can either remove, relocate, increase or decrease flood risks. These changes include adding, shifting or enlarging SFHAs and/or floodways, increasing Base Flood Elevations (BFEs), reducing SFHAs and/or floodways or removing land areas no longer having a flood risk due to man-made protection. Map amendments remove land areas that have inadvertently been declared SFHAs. This article attempts to analyze the process, the regulations, and the role of the community with the hope that a better understanding of the map revision and amendment processes will lead to more effective local floodplain management programs.

THE PROCESS

Because of development, changes in hydrology, improvements in methodology used to model floodplains and increasingly accurate topographic data, flood risk information has the potential to change. FEMA has addressed the issue by standardizing a process for revising and amending flood maps. This process can be initiated by either the community or a private party at any time. For changes to floodplain maps which alter the flood hazard or BFE, a *Physical Map Revision (PMR)* or *Letter of Map Revision (LOMR)* is needed. For a determination, whether a structure or parcel of land may have been inadvertently included in the SFHA, a *Letter of Map Amendment (LOMA)* can be requested, based on better data than when the NFIP map was prepared. Both processes require the submission of technical data and the appropriate

IMPORTANT

FLOODPLAIN MANAGEMENT SURVEY

This survey is to determine the level of interest in forming a statewide association representing local officials and others in Ohio involved in floodplain management. A number of other states have formed such associations which have become successful forums for promoting a unified approach towards solving flooding problems. The benefits cited by these associations include promoting information exchange, providing training opportunities, improving communication among local, state, and federal agencies, as well as providing networking support and identification of legislative needs.

Please complete the following questions by checking off the appropriate responses or providing brief explanations.

1. What best describes you:

- Local Floodplain Permit Official
- Consultant (engineer, architect, surveyor, *etc.*)
- Other professionals (insurance, real estate, lending, *etc.*)
- Local, state or federal agency representative
- Other _____

2. How would you rank the following as items a statewide floodplain management association should help address? Place an *H* for High, *M* for Medium, and *L* for Low priority before each item.

- __ a. Providing a forum where communities can share issues, information and problems relating to the administration of local floodplain management regulations.
- __ b. Gaining better insight and information about the regulatory requirements of the National Flood Insurance Program.
- __ c. Establishing better communication between local, state and federal agencies.
- __ d. Receiving training through workshops and seminars.

- ___ e. Obtaining information about other water-related state and federal programs (i.e., wetlands, stormwater management, flood protection) fill and dredging activities).
- ___ f. Exchanging information on available publications, handbooks, and floods information data.
- ___ g. Providing a unified voice to help determine legislative needs, influence federal policy, and secure better flood risk mapping.

3. What additional activities should a state association provide? Explain_____

4. Would you join a statewide floodplain management association? YES / NO
Explain_____

5. Should such an association be affiliated with another water resource, planning, emergency management, or environmental organization? YES/NO
Explain_____

6. The Water Management Association of Ohio (WMAO), an existing non-profit organization addressing all aspects of water issues in Ohio, has expressed interest in serving floodplain managers as part of its organizational structure. How do you feel about joining other floodplain managers as a focal group within WMAO? Explain_____

7. Have you heard about the Association of State Floodplain Managers (ASFPM)? ASFPM is a national organization dedicated to floodplain management, flood hazard mitigation and flood preparedness. Many state floodplain management associations have also chosen to become chapter members in this organization. Would you like to receive information about the ASFPM? YES/NO

8. The Ohio Department of Natural Resources' (ODNR) floodplain management program focuses on providing the technical advice and information to help locals make the right decisions. Do you believe that:

a. Such development decisions should continue to remain at the local governmental level? YES/NO

b. State legislation should be enacted to provide for a uniform statewide floodplain management permit system? YES/NO

c. The state should provide additional technical advice and assistance to enable local officials to make better informed decisions. YES/NO

If YES, what additional type of support would you like to see provided? Explain _____

9. What additional support would you like to receive to enable you to do a more effective job? And from whom -state (Ohio Department of Natural Resources), federal (Federal Emergency Management Agency)? Explain _____

10. Have you received any type of floodplain management training or education? YES/NO. If YES explain _____

11. Do you believe the National Flood Insurance Program's minimum standards adequately address your community's floodplain management needs? YES/NO

Explain _____

12. Do you believe your community's flood risks have been adequately identified? YES/NO
If NO, explain _____

**THANK YOU FOR YOUR INPUT AND TIME SPENT COMPLETING SURVEY! PLEASE RETURN
THE COMPLETE FORM BY MARCH 20, 1995.**

The Ohio Department of Natural Resources, Division of Water and the Water Management Association of Ohio (WMAO) will be co-hosting a one-day Spring Conference on May 9, 1995 in Columbus. The conference's agenda will emphasize floodplain management issues and include a floodplain management workshop in the afternoon. Based on the results of this survey, further discussions about forming a state association will take place at that workshop.

**Do you support the idea of forming a state floodplain management association in Ohio? ••YES/NO
Would you like to attend the WMAO Spring Conference in Columbus? ••YES/NO**

If you indicate yes to either question, be sure to include your name and address below so that we may provide you further information.

FOLD ALONG THIS LINE

From:

PLACE
STAMP
HERE

**Mr. Peter Finke
Ohio Department of Natural Resources
Division of Water
1939 Fountain Square
Columbus, Ohio 43224**

FEMA application/certification forms.

Physical Map Revisions and Letters of Map Revision (PMRs and LOMRs)

Physical Map Revisions involve revising and republishing individual map panels affected by the requested change. They are generally required only when necessary to show flood hazard changes involving large areas or when BFEs have been increased. LOMRs are generally used to show reduced flood hazard areas based on fill, culverts or other activities and are well suited to changes affecting small areas of the floodplain (See the article on *Letters of Map Revisions* in this issue). Instead of physically revising the map panel, FEMA will issue a LOMR which will show a copied portion of the revised floodplain map or description of the revised area.

The first step to obtain a PMR or LOMR is to complete the appropriate FEMA application/certification forms. One form, the *Revision Requester and Community Official Form*, requires the Chief Executive Officer (or another community official designated by the CEO) of the community to acknowledge the request.

Once FEMA receives the required data, forms and any fees associated with processing the PMR or LOMR, the application is reviewed. FEMA then decides on the revision, followed by a 90-day appeal period if BFEs are changed. Since the NFIP is non-taxpayer funded, FEMA has established a fee schedule for processing PMRs and LOMRs

Letter of Map Amendment (LOMA).

A LOMA is a determination on a structure or parcel of land that may have been inadvertently included in the SFHA when the floodplain map was prepared. It is usually based on better data than when the NFIP map was prepared. LOMAs are issued only for structures or parcels of land based on natural topographic conditions and cannot be used for the removal of structures or parcels of land from an SFHA that involve alterations in topography, such as filling and grading which have occurred after the first NFIP map for the affected parcel was prepared.

After completing the appropriate application/certification forms, the applicant sends the forms to FEMA for processing. No fees are charged for evaluating a single lot LOMA request, but are incurred for multiple-lot requests.

The FEMA application/certification forms are easy enough to get, but how about completing the forms and acquiring the technical data? Who must bear the responsibility and cost for generating and submitting technical data? Read on.

THE REGULATIONS

In Ohio, some of the map revision responsibilities are addressed under the *floodway encroachments* and *alteration of a watercourse* sections contained in most local flood damage prevention regulations. For any activity that triggers either of these sections, FEMA must be notified. The notification is explained more thoroughly in the federal NFIP regulations section 65.3. The section reads:

A community's base flood elevations may increase or decrease resulting from physical changes affecting flood conditions. As soon as practicable but not later than six months after the date such information becomes available, a community shall notify the Administrator [FEMA] of the changes by submitting technical or scientific data in accordance with this part...

In other words, the burden of proof for the effects of these activities lies with the community!

THE COMMUNITY'S ROLE

During our Community Assistance Visits, a recurring problem we find is that communities allow a floodway encroachment or watercourse alteration to occur without properly reviewing the project. As a result, the community is left with both the cost and responsibility of generating and submitting the data to support a map revision. The cost of correcting these violations cumulatively could be staggering, but the cost of not correcting these violations could jeopardize the community's participation in the NFIP. What is a community to do?

The ultimate responsibility for documenting and reporting changes in the BPE and floodway rests with the community. An effective local floodplain management program will address potential map changes before they become potential headaches. Local floodplain codes, based on ODNR's model regulations, require a project applicant to generate technical data for all floodway encroachments, watercourse alterations, and changes to BFE, as a condition for permit approval. This relieves the community of the financial burden for supplying data to support FEMA map revisions. If BFEs are increased, as happens with floodway encroachments, prior approval by FEMA is needed in addition to approval from the local floodplain administrator. 

Letters of Map Revision - Based on Fill

adapted from *Flash Flood News*, September 1994, North Carolina. Division of Emergency Management Berry A. Williams., Jr., State Coordinator

A map revision is a change to the community's current effective NFIP map. When a map revision is warranted, (e.g., results in an enlarged Special Flood Hazard Area (SFHA) or higher Base Flood Elevations (BFEs)), FEMA will usually revise and republish the affected map panels and, if necessary, the *Flood Insurance Study* (FIS). When changes involve a single structure or parcel of land or, perhaps, a small subdivision, FEMA will generally not reprint the whole map panel but will issue a *Letter of Map Revision* (LOMR) The Letter, which officially revises the effective map, usually identifies the location of the revision by referring to the address or the recordation data for the property. The change to the SFHA is usually described in the text of the Letter but sometimes a photocopied part of the flood map panel is attached to better show the revision to the SFHA. When issued, FEMA sends the LOMR to the applicant and a copy to the chief elected official of the community.

A map revision based on fill (LOMR-F) is most often requested to remove from the SFHA one or

more structures elevated on fill, or parcels of undeveloped land that have been filled to or above the BFE. This removes the mandate that a lending institution must require the landowner to purchase flood insurance as a condition of obtaining a federally-backed mortgage. The difference in application between a LOMR and a LOMA should be understood. A LOMR-F is requested when the fill elevating the structure or parcel has been placed after the date of the first FEMA map that showed the parcel or structure in the SFHA. If the fill was placed before the first FEMA map date or if the original ground elevation is higher than the BFE, the landowner would apply for a LOMA. In other words, LOMRs are generally the result of man-made actions to change the flood hazard, while LOMAs are used to correct inadvertent inclusions to the flood hazard area.

The first step for the property owner in obtaining a LOMR-F is to obtain an application package from the FEMA office in Chicago by calling (312) 408-5500 or by calling the Ohio Department of Natural Resources, Division of Water, Floodplain Management Office at (614) 265-6750.

The package is entitled *MT-1: Amendments and Revisions to National Flood Insurance Program Maps, Application/Certification Forms and Instructions for Letter of Map Amendment, Conditional Letter Of Map Amendment) Letter of Map Revision (Based on Fill)*. It contains five forms, the first of which is the PROPERTY INFORMATION form to be completed by the owner. A copy of the FIRM panel that shows the property location must accompany this form. The owner can purchase FIRM panels from FEMA's Flood Map repository by calling 800-358-9616. Map panels are 60 cents each, with a minimum charge of five dollars per order. Alternatively, the community may assist the applicant by providing photocopies of the section of the map panel showing the property and the panel title block. Community officials may obtain additional flood maps and their community's FIS without charge by calling the same number.

The ELEVATION INFORMATION form must be completed by a registered professional engineer or licensed land surveyor. Information needed to complete the form includes: flooding source, flood

zone, floodway, information (relative to the development), BFE and lowest floor or lowest ground elevation. Much of this information is available from the community as it should be maintained as part of the community's permit records. The engineer or surveyor may ask you, the floodplain administrator, for it. Please note that you are not authorized to sign the form unless you are an engineer or surveyor. Requests involving more than one lot or structure must include a completed SUMMARY OF ELEVATIONS - INDIVIDUAL LOT BREAKDOWN form, a copy of which is included in the package.

If a BFE is not available for the property and one cannot be obtained from another authoritative source such as the Corps of Engineers or the Natural Resource Conservation Service (formerly the Soil Conservation Service), the owner will have to employ a registered professional engineer to calculate it.

For revision requests involving more than a single structure or parcel of land, the requester must demonstrate that the fill placed to elevate the structures or parcels will not settle below the BFE and that it is adequately protected from the forces of erosion, scour or differential settlement. Evidence of this is submitted on a CERTIFICATION OF FILL COMPACTION form. The fill must have been compacted to 95 percent of the maximum density obtainable with the Standard Proctor Test method or an acceptable equivalent. This form is to be completed by a registered professional engineer or a community official who monitored the fill placement.

Often it is advantageous to determine whether a proposed project will qualify for a *Conditional Letter of Map Revision* based on fill (CLOMR-F). Sometimes the lending institution requires this as a condition of the loan. Other times, the property owner wants to be sure that FEMA will make the map revision and eliminate the mandatory flood insurance requirement. The procedure to follow is to apply for a CLOMR-F. A CLOMR-F does not officially change the flood map. Rather, FEMA comments on a proposed project as to whether it will qualify for a LOMR-F when completed. Upon completion of the project, the owner or community has the responsibility to submit as-built

information on the project, to receive the LOMR-F. It is preferable to ask FEMA to review a proposed project so that any potential problems can be ironed out before construction is started and changes become difficult to do. The issuance of CLOMR-F does not imply that FEMA has superseded the local floodplain administrator regarding project approval.

Finally, the request for a map revision must be submitted to FEMA through the community. This is to ensure that the placement of the fill has been properly permitted and reviewed and that no floodway has been affected or flooding potential increased for nearby properties. The COMMUNITY ACKNOWLEDGEMENT OF REQUESTS INVOLVING FILL form is filled out and signed by a community official. The community incurs no financial obligation for the fees charged by FEMA by signing the form. There is no fee for a LOMR sought by an individual property owner (not developer) on a single lot or structure located outside the floodway. 

Community Rating System -an Overview

By Peter G, Finke, Administrator

The Community Rating System (CRS) is a relatively new incentive program of the National Flood Insurance Program (NFIP) that recognizes communities for their good flood damage reduction efforts. Under the CRS, communities that undertake selected activities above and beyond the minimum NHP requirements are rewarded with lower flood insurance premium rates on every flood insurance policy sold. The goals of the CRS are:

1. To reduce flood losses
2. To facilitate accurate insurance rating, and
3. To promote the awareness of flood insurance

Participation in the CRS is voluntary. Any community that participates in the Regular Phase of the NFIP and is in good standing with that program is eligible to apply for the CRS. According to Ohio Department of Natural Resources (ODNR), Division of Water figures, virtually all of Ohio's 694 NFIP

participating communities are in the Regular Phase and eligible to join the CRS. Only 30 communities currently are still in the entry, or Emergency Phase, of the NFIP.

The CRS is patterned after the more well-known *Fire Insurance Public Protection Class* system used by the insurance industry. Under that system a community's fire protection program is evaluated and assigned a class number ranging from 10 to 1. The lower a community's class number, the lower the fire insurance premium will be to the property owner. The Federal Emergency Management Agency (FEMA), which administers the NFIP, has hired ISO Commercial Risk Services - the company that does the fire protection program rating - to also provide the flood protection rating under the CRS.

A community applies for participation in the CRS by submitting documents to FEMA showing which of the 18 CRS-recognized activities it is, or will be, implementing. FEMA verifies that the community is implementing the activities and sets the credit. The *CRS Schedule* identifies 18 accredited activities organized under the following four categories: **Public Information, Mapping and Regulations, Flood Damage Reduction, and Flood Preparedness.** The *Schedule* assigns credit points based on how effectively a particular activity reduces flood damage. Many Ohio communities are already undertaking some activities that qualify for CRS credit. For example, a community that responds to requests for determining what flood zone a property is in, or that regulates stormwater runoff, could be receiving CRS credit for these activities.

How To Get Started

A community interested in joining the CRS should contact FEMA Region V, 175 West Jackson Boulevard, 4th Floor, Chicago, IL 60604 and request a description of the 18 activities. After receiving the information, a community should determine which of these activities it is already doing, and which additional activities could be undertaken for relatively little effort. The credit points of these activities will then be totaled to determine the premium discount. Listed below in decreasing order of popularity are the most frequently undertaken activities of Ohio's CRS-participating communities.

Activity 310 - Maintain records of FEMA elevation certificates on new buildings in the floodplain and make copies available on request.

Activity 320 - Respond to inquiries to determine what Flood Insurance Rate Map zone a property is in.

Activity 630 - State dam safety program. Credit is automatically provided to all Ohio CRS communities based on Ohio's statewide dam safety program.

Activity 350 - Maintain reference materials on flood insurance and flood protection at a local public library.

Activity 330 - Conduct periodic outreach projects, such as mailing information to residents on flood insurance, flood hazard awareness, and flood protection measures.

Activity 540 - Conduct periodic inspections of watercourses and drainage systems and remove debris as needed.

Activity 450 - Ensure that stormwater runoff from developments will be no greater than runoff from sites before development.

Interest in the CRS is expected to increase over the coming years as a result of the recently enacted *NFIP Reform Act* (see article on page one). One of the Act's provisions calls for greater scrutiny by federal regulators to ensure that mortgage lenders financing structures located in flood hazard areas comply with federal flood insurance purchase requirements. States that currently have only a low percentage of their flood-prone structures covered by flood insurance may see a significant increase in the number of flood insurance policies. Higher flood insurance policy counts will provide an impetus for local officials to join the CRS. Ohio, with only 5 to 10 percent of its flood-prone structures insured against flooding, is expected to witness major increases in flood insurance policies. Further information on the CRS may also be obtained from our office at (614) 265 -67150. 💧

Training Opportunity

By Cynthia J, Crecelius, Supervisor

A common thread uniting many of the local floodplain managers across Ohio is the feeling that you are not offered enough training opportunities. The Federal Emergency Management Agency -Region V Office has responded to your need by informing us that there are some openings for individuals who wish to attend courses specific to floodplain management at the Emergency Management Institute (EMI) located in Emmitsburg, Maryland.

Managing Floodplain Development Through the National Flood Insurance Program is a 4½ day course designed for focal officials responsible for administering their local floodplain management regulations. The course focus is on the concepts of floodplain management, the maps and flood insurance studies, administration of local regulations, and the relationship between floodplain management and flood insurance.

Course dates for 1995 are March 27 - 31 and June 5-9. Application for admission to EMI is made using the *General Admission Application Form* (FEMA Form 755). Forms can be obtained from the Division of Water or from the local emergency management office in your county.

There are no tuition fees for the course. Instruction, books, and housing are provided at no cost. Participants are responsible for the cost of meals provided and for personal/incidental expenses. The purchase of a campus meal ticket is required. Reimbursement in the form of a student stipend may be paid to individuals representing State or local governments.

If you or your staff would be interested, please contact our office at (614) 265-6754 as soon as possible. 

WORKSHOP WATCH

By Christopher M Thoms, Planner ~

Would you like to be host to a Flood Loss Reduction Workshop for the community officials in your area?



Workshops are scheduled for northwest Ohio in February, for southeast Ohio in March, for central Ohio in May. We are still looking for one or two additional workshop locations

By committing to be a local host, you provide the officials in your area an opportunity to increase their awareness and knowledge of National Flood Insurance Program (NFIP) topics. The workshop has been designed as a half-day session from 8:30 a.m. to noon, and is focused on assisting local officials with understanding floodplain management concepts and specific NFIP participation responsibilities. Workshop participants will be provided an opportunity to work in small groups through a hands-on exercise simulating development review and permit issuance for a proposed development in a special flood hazard area.

As local host we ask that you would contribute:

- A room, capable of accommodating 20-50 people, suitable for lecture and work groups
- Use of audio/visual equipment (overhead projector, screen)
- Refreshments

The Floodplain Management staff will provide the instructors and the workshop materials. Our office will also mail the necessary invitations to community officials in your area and keep track of the responses.

If you would like to host a workshop in your area, please contact our office at (614) 265-6750. We will be happy to answer your questions or provide additional information. 

Thank You

By Christopher M. Thoms, Planner

On November 17, 1994 our staff conducted a Flood Loss Reduction Workshop in southwest Ohio. Thirty officials representing twenty-one communities in an eight-county area attended this session. The reviews are in and the response was overwhelmingly positive from the participants. Clermont County was a host to this workshop. The Floodplain Management staff extends our thanks to Ray Sebastian, Chief Building Official for his help and hospitality. 

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Christopher M. Thoms, Editor.

For more information or assistance with Ohio's floodplain maps and regulations call (614) 265-6750 or visit our offices.

If you know of someone who would want to receive a copy of *The Antediluvian* but didn't, please let us know. If your copy of the newsletter was misdirected, please send us address corrections, office or personnel changes to our offices at 1939 Fountain Square Bldg E-3 Columbus, Ohio 43224



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