

**Testimony On  
FY 2009 Budget Request  
Federal Emergency Management Agency**

**Submitted by  
Association of State Floodplain Managers**

**To the Committee on Appropriations  
Subcommittee on Homeland Security  
U.S. House of Representatives**

March 12, 2008

The Association of State Floodplain Managers (ASFPM) and its 26 State Chapters represent over 11,000 state and local officials as well as other professionals engaged in all aspects of floodplain management and hazard mitigation. This includes floodplain management, mapping, engineering, hydrology, flood mitigation, forecasting, water resources, planning, community development, emergency response and insurance. All ASFPM members are concerned with reducing our nation's flood-related losses. Our state and local officials are the federal government's partners in implementing flood mitigation and flood insurance programs and working to achieve our shared objectives. Our state members head offices that are designated by the state governors to coordinate the National Flood Insurance Program (NFIP) with communities.

In general, the Association of State Floodplain Managers is pleased with the funding requested for an on-going flood mapping program and with the funding requested for the repetitive flood loss grant programs that are funded under the National Flood Insurance Program. We would urge the Committee to fully fund the Flood Mitigation Assistance grant program at its authorized level of \$40 million. In addition, we urge that the Pre-Disaster Mitigation grant program under the Stafford Act be funded at a level significantly higher than the budget request of \$75 million.

**Flood Mitigation Assistance Program (Sec. 1366)**

The budget request includes \$35.7 million from the National Flood Insurance Fund for the regular Flood Mitigation Assistance (FMA) program. The program was authorized at \$40 million in the Flood Insurance Reform Act of 2004 to incorporate an enhanced capability to mitigate repetitive flood loss properties in addition to its support of local mitigation planning and other projects.

In the past, FEMA had determined that FMA could be funded only from policy fee income rather than from premium income and funds were provided by transfer from the National Flood Insurance Fund to the Flood Mitigation Assistance Fund. The explanation for funding the program at \$34 million in FY '08 referenced the amount

available from fee income. For FY '09, the budget proposes to eliminate the FMA Fund and to fund the program directly from the NFIF. This would appear to provide for funding from premium income in the same manner that the two repetitive loss mitigation programs are funded (Sections 1361A and 1323 of FIRA 2004). The rationale for limiting FMA because of the availability of fee income seems to be no longer valid.

**▶▶ ASFPM urges the Committee to provide the authorized \$40 million for the Flood Mitigation Assistance Program.**

### **Flood Mapping**

The budget request includes \$150 million in appropriated funds and also adds funds derived from policy holder fees for a total mapping program level of approximately \$248 million in FY '09, thus approaching the FY '08 funding level.

ASFPM is very pleased that the budget request includes provision for a substantial on-going mapping program. The final funding year for the 5 year Map Modernization Initiative was FY '08. While the Map Modernization effort made a major contribution to improving the nation's flood risk maps, much mapping work remains to support FEMA's risk identification and risk reduction (mitigation) responsibilities for working with states and localities to reduce flood losses. Many areas require new engineering (hydrology and hydraulics) studies; many areas have yet to be mapped; and risk identification in many areas is being affected by decertification of levees. Keeping flood maps current is a dynamic process since the hazard changes due to development, natural events and other topographic changes. Flood insurance reform legislation pending in the Congress would add additional mapping tasks to FEMA's risk identification activities. It is critical to the National Flood Insurance Program and to federal, state and local flood risk reduction efforts that FEMA continue its mapping activities at a robust level.

**▶▶ ASFPM strongly supports the requested funding level for flood risk mapping.**

### **Pre-Disaster Mitigation Grants**

ASFPM is concerned about the reduced funding of \$75 million requested for FY '09 for the Pre-Disaster Mitigation Grant program (PDM). The program was funded at \$114 million in FY '08 and up to \$150 million in some prior years. FEMA reports that this nationwide, multi-hazard competitive program regularly draws applications that represent needs much greater than the available funding can address. There is demonstrated need for much more mitigation activity than this program can support, even at \$150 million.

The Congressionally requested report of the Multi-Hazard Mitigation Council (MMC) of the National Institute of Building Sciences released in 2006 found an overall benefit-to-cost ratio of 4 to 1 for mitigation investment. The ratio was 5 to 1 for flood mitigation

projects. The Pre-Disaster Mitigation grant program generates local mitigation funding through its cost-share. It is evident that mitigation is a wise investment and good public policy.

A significant number of applications submitted each year cannot be approved due to lack of funds. These applications are a product of focused work at the local level, often with state involvement, to develop projects that are consistent with local and state hazard mitigation plans and meet the many other important program eligibility requirements. FEMA has developed, and then refined, an evaluation process for grant applications that is rigorous and involves mitigation officials from all over the country participating in review panels.

The process of developing hazard mitigation plans and of working locally to put together mitigation grant applications has the important corollary benefit of building local commitment to risk reduction. Utilizing a significant portion of limited PDM funds in funding directives outside of the competitive grant application process can have the unfortunate effect of reducing impetus to utilize that awareness and commitment building process at the local level. We urge the Committee to avoid use of funding directives and instead to encourage the local planning and project development that leads to local commitment to hazard mitigation and to the most cost effective mitigation projects.

To enhance the development of eligible and good quality grant applications from the many jurisdictions that do not necessarily have mitigation expertise locally or the funds to hire such expertise, the Committee may wish to consider setting aside a portion of PDM funds for allocation to states to support technical assistance to communities. Many communities nationwide could improve their hazard mitigation activities with even minimal technical assistance

**►► ASFPM urges increased funding for Pre-Disaster Mitigation grants; urges encouragement of local mitigation awareness and commitment by not funding projects through directives and suggests consideration of a set-aside for allocations to states so that they can provide technical assistance to communities.**

## **Other**

FEMA has been working collaboratively with the US Army Corps of Engineers on assessment of flood control structures (usually levees) and the reflection of that work on FEMA's flood maps. ASFPM notes that the interagency collaboration is most effective and important.

FEMA has embarked on a unification of requirements and applications procedures for its five mitigation grant programs. ASFPM supports this effort as it will very likely simplify and streamline the grant application process for states and communities.