



AMERICAN PUBLIC WORKS ASSOCIATION

Your Comprehensive
Public Works Resource

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June 12, 2023

Millicent Brown Wilson
Records Management Branch Chief – Office of the Chief Administrative Officer
Federal Emergency Management Agency
500 C Street, SW
Washington, DC 20472-3100

Re: Docket ID FEMA-2023-0011, **Revisions to National Flood Insurance Program (NFIP) Maps**

ATTN Ms. Brown Wilson:

On behalf of the more than 31,000 members of the American Public Works Association (APWA), please find the following comments pertaining to the Federal Emergency Management Agency's (FEMA's) solicitation for input to improve NFIP maps. APWA serves professionals in all aspects of public works—a fact that sets it apart from other organizations and makes it an effective voice of public works throughout North America. APWA includes not only personnel from local, county, state/province, and federal agencies, but also private sector personnel.

As you are no doubt aware since 2017 there have been 25 short-term NFIP extensions. APWA has long argued that this approach is not sustainable. Highlighted within APWA's 118th Session of Congress Emergency Management Policy Priority document, which you will find attached, we advocate for the enactment of a predictable five-year NFIP authorization to give Congress time to develop a viable, longer-term solution. This would allow NFIP to function with a greater degree of certainty, and a five-year extension would simultaneously allow federal leaders to work together to provide long-term sustainable guidance for NFIP to evolve as needed and best serve its customers, which includes providing reliable updated maps.

It is apparent that the current financial state of the flood insurance program is not sustainable and needs to be addressed in a fiscally responsible, and timely manner. **In order to improve the overall effectiveness of the NFIP, the development of standards and guidelines should be established through a process involving stakeholders at all levels of government, private, and non-profit sectors when creating maps.** This would include providing participants currently in the insurance program advance notice of any changes regarding the eligibility requirements for coverage, and potential rebuilding that accounts for the ongoing impact of climate change following a disaster. We urge FEMA to consider the maintenance and preparation that is needed to help mitigate any potential future hazards (natural or man-made) particularly when dealing with new construction or building in NFIP areas.

We understand that NFIP map revisions do not take place unless modifications to Special Flood Hazard Areas (SFHA's) are designated; those which have a one percent annual chance of flooding. APWA believes that NFIP maps that include these designations should be taken into consideration for re-evaluation concurrently while NFIP maps are under construction.

It is also important to note that, while not easy, relocating people and removing structures from flood zones have the potential benefit of reducing the needed resources committed to rescue efforts. These resources, including public works staff and equipment, could be reallocated to other response and recovery needs. Additionally, the infrastructure needed to support the residents and properties in a flood prone area may be able to be eliminated or reduced depending on the extent of the relocation effort. **If the desire is to further reduce potential liabilities in**

PRESIDENT
B. Keith Pugh, P.E., PWLF

CHIEF EXECUTIVE OFFICER
Scott D. Grayson, CAE



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the flood plain by removing structures, the real factor is the relocation of people, their families, and their livelihoods. Understanding that this is not a small endeavor, FEMA should factor in the burden and challenges for residents who may not have the financial means to relocate.

Another consideration for FEMA is to consider there might be interest from the private sector in developing flood insurance products for low or minimal risk structures (outside of regulatory floodplains). However, it is important to weigh the impact if the private sector were to insure the low-risk structures and left the government backed flood insurance to cover the highest risk areas. This could lead to the eventual reality that there will be two sets of people living in floodplains--those that can afford the loss, and those that have nothing to lose. APWA would strongly encourage consulting with private insurance while considering changes to areas that receive specific designations on NFIP maps.

APWA appreciates this opportunity to comment on NFIP and provide recommendations to improve the program. With the inclusion of fiscally responsible policy and clear direction regarding the application of NFIP guidelines, we believe that this will allow for greater stability and success in addressing flooding and mapping issues.

APWA members are committed to public service by profession and being a resource for federal initiatives is just another way we make normal happen in the communities we serve. If APWA can be of further assistance, please contact Marty Williams, APWA Government Affairs Manager, at mwilliams@apwa.net or 202-218-6732.

Thank you for your time and consideration of these comments.

Sincerely,

A handwritten signature in black ink, reading "Scott D. Grayson". The signature is fluid and cursive, with a long horizontal line extending from the end.

Scott D. Grayson, CAE
CEO/Executive Director
American Public Works Association

Sincerely,

A handwritten signature in black ink, reading "B. Keith Pugh". The signature is bold and stylized, with the letters "B", "K", and "P" being particularly prominent.

Keith Pugh, P.E., PWLF
President
American Public Works Association

PRESIDENT
B. Keith Pugh, P.E., PWLF

CHIEF EXECUTIVE OFFICER
Scott D. Grayson, CAE